



### McClellan Air Force Base

Finding of Suitability to Transfer

Capehart Military Family Housing and Lawrence Links Golf Course

January 2002

Air Force Base Conversion Agency

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<sup>\*</sup>Note – Attachment 5 was provided with the draft FOST document

# Finding of Suitability to Transfer (FOST) for Capehart Military Family Housing and the Lawrence Links Golf Course McClellan AFB, CA

#### 1. PURPOSE

- 1.1 The purpose of this Finding of Suitability to Transfer (FOST) is to document environmentally-related findings and the suitability to transfer for the proposed deed of real property and any improvements at McClellan Air Force Base (AFB), California, to the County of Sacramento, under the terms of an Economic Development Conveyance (EDC) or to other agencies under a Public Benefit Conveyance (PBC). The property is described in Section 2 below. "Like use" is assumed for the facilities; that is, new uses of the facilities will remain residential, recreational, and commercial in nature.
- 1.2 This FOST is based on an analysis of information contained in the following documents: (1) the Final Programmatic Environmental Impact Statement for Disposal and the Environmental Impact Report (FPEIS/EIR) for Reuse and Rezoning of McClellan AFB, California dated July 1997; (2) the Basewide Environmental Baseline Survey (EBS) dated November 1996; (3) the Final Supplemental EBS (SEBS) for the property dated July 1997 (as amended December, 1997); (4) the Visual Site Inspections/Physical Site Inspections (VSIs/PSIs) conducted in conjunction with the SEBS and supplemental VSIs conducted in December 1997; (5) the Basewide Finding of Suitability to Lease (FOSL) dated August 1998; (6) the Supplemental Finding of Suitability to Lease (SFOSL) for Group 7 Facilities dated February 2001; (7) the final Site Specific Supplemental Environmental Baseline Survey (SSSEBS) for Group 7 Facilities dated January 2001, and associated Environmental Condition Report dated February 2001; (8) December 2001 VSI; (9) the McClellan AFB BRAC Cleanup Plan dated April 1999; (10) the Water Quality Control Plan (Basin Plan) for the Sacramento River and San Joaquin River Basins, revised September 15, 1998; (11) the final Non-CERCLA Off-Base Data Gap Summary Reports/Field Sampling Plans (January 1999); (12) the final Non-CERCLA Off-Base Data Gap Capehart Summary Memorandum (December 1999); (13) the draft Bioventing Pilot Test Work Plan Addendum for the Capehart Gas Station (Building 5365) (January 1994); (14) the final Bioventing Pilot Test Results Report for the Capehart Gas Station (March 1996); and (15) Building 5365 Underground Storage Tank site Investigation, final Work Plan, December 2000.

#### 2. PROPERTY DESCRIPTION

The property to be transferred consists of the Capehart Military Family Housing (MFH) area, which occupies approximately 216 acres 3 miles north of McClellan AFB. The housing area was opened in 1962 to provide housing for officers and enlisted personnel. The MFH area includes 540 dwelling units (one duplex facility is counted as two dwelling units), the Lawrence Links Golf Course, and additional facilities. GROUP 7 SSSEBS Table 1-1 indicates the usage of individual facilities in this parcel. The following is a list of all Buildings/Facilities associated with this FOST:

518, 5000, 5001, 5002, 5003, 5004, 5005, 5006, 5007, 5008, 5009, 5010, 5011, 5012, 5013, 5014, 5015, 5016, 5017, 5018, 5019, 5020, 5021, 5022, 5023, 5024, 5025, 5026, 5027, 5028, 5029, 5030, 5031, 5032, 5033, 5034, 5035, 5036, 5037, 5038, 5039, 5040, 5041, 5042, 5043, 5044, 5045, 5046, 5047, 5048, 5049, 5050, 5051, 5052, 5053, 5054, 5055, 5056, 5057, 5058, 5059, 5060, 5061, 5062, 5063, 5064, 5065, 5066, 5067, 5068, 5069, 5070, 5071, 5072, 5073, 5074, 5075, 5076, 5077, 5078, 5079, 5080, 5081, 5082, 5083, 5084, 5085, 5086, 5087, 5088, 5089, 5090, 5091, 5092, 5093, 5094, 5095, 5096, 5097, 5098, 5099, 5100, 5101, 5102, 5103, 5104, 5105, 5106, 5107, 5108, 5109, 5110, 5111, 5112, 5113, 5114, 5115, 5116, 5117, 5118, 5119, 5120, 5121, 5122, 5123, 5124, 5125, 5126, 5127, 5128, 5129, 5130, 5131, 5132, 5133, 5134, 5135, 5136, 5137, 5138, 5139, 5140, 5141, 5142, 5143, 5144, 5145, 5146, 5147, 5148, 5149, 5150, 5151, 5152, 5153, 5154, 5155, 5156, 5157, 5158, 5159, 5160, 5161, 5162, 5163, 5164, 5165, 5166, 5167, 5168, 5169, 5170, 5171, 5172, 5173, 5174, 5175, 5176, 5177, 5178, 5179, 5180, 5181, 5182, 5183, 5184, 5185, 5186, 5187, 5188, 5189, 5190, 5191, 5192, 5193, 5194, 5195, 5196, 5197, 5198, 5199, 5200, 5201, 5202, 5203, 5204, 5205, 5206, 5207, 5208, 5209, 5210, 5211, 5212, 5213, 5214, 5215, 5216, 5217, 5218, 5219, 5220, 5221, 5222, 5223, 5224, 5225, 5226, 5227, 5228, 5229, 5230, 5231, 5232, 5233, 5234, 5235, 5236, 5237, 5238, 5239, 5240, 5241, 5242, 5243, 5244, 5245, 5246, 5247, 5248, 5249, 5250, 5251, 5252, 5253, 5254, 5255, 5256, 5257, 5258, 5259, 5260, 5261, 5262, 5263, 5264, 5265, 5266, 5267, 5268, 5269, 5270, 5271, 5272, 5273, 5274, 5275, 5276, 5277, 5278, 5279, 5280, 5281, 5282, 5283, 5284, 5285, 5286, 5287, 5288, 5289, 5290, 5291, 5292, 5292, 5293, 5294, 5295, 5296, 5297, 5298, 5299, 5300, 5301, 5302, 5303, 5304, 5305, 5306, 5307, 5308, 5309, 5310, 5311, 5312, 5313, 5314, 5315, 5316, 5317, 5318, 5319, 5320, 5321, 5322, 5323, 5324, 5325, 5326, 5327, 5328, 5329, 5330, 5331, 5332, 5333, 5334, 5340, 5350, 5357, 5360, 5365, 5384 (Golf Clubhouse), 5387, 5388, 5389, 5390, 5391, 5392, 5393, 5395, 5396, 5397, 5398, 5399, 5401, 5408, 5409, 5500, and 9100 (Golf Course).

The non-housing facilities are Buildings/Facilities 518, 5008, 5200, 5208, 5240, 5357, 5360, 5365, 5384 (Golf Clubhouse), 5388, 5390, 5391 (Water Tower), 5392, 5393, 5395 (bus shelter), 5396 (pool), 5397 (bus shelter), 5398 (bus shelter), 5399 (bus shelter), 5401, 5408, 5409, 5500, and 9100 (Golf Course). Facility 5385 was the old Golf Clubhouse and was demolished in 1992.

#### 3. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

The environmental impact of this proposal has been adequately analyzed and disclosed in compliance with NEPA. This impact is analyzed in the FPEIS/EIR. Based on this analysis, the advantages to the community of proceeding with the delivery of possession under an EDC (including the public interest of the transfer of possession) outweigh preventing the proposed use of the property due to any environmental impact to human health and the environment.

#### 4. ENVIRONMENTAL CONDITION OF THE PROPERTY

Based on a review of the Basewide FOSL, the SFOSL for Group 7 facilities (Capehart MFH and the Lawrence Links Golf Course), the EBS, SEBS, SSSEBS and VSIs/PSIs, the overall environmental condition category (ECC) of the property footprint is ECC 3 (see GROUP 7 SSSEBS Figure 5-1) because a building (i.e., 5388) and areas of soil within the footprint are currently designated ECC 3. Two areas of soil are designated ECC 3; they include the Maintenance Complex Area near Building 5390 and the area beneath and surrounding Building 5388. Soil in the area of the aboveground storage tanks east of Building 5390 has been designated ECC 2. The Golf Course surface soil has been designated ECC 1. Due to the potential for petroleum contamination in the groundwater, groundwater for the entire property has been designated ECC 2.

An area of soil gas contamination within the property footprint is designated ECC 2, as a result of petroleum product releases associated with the Capehart gas station (Building 5365) and its bioremediation area. As mentioned above, groundwater within the property footprint is ECC 2. However, confirmational groundwater sampling will be conducted under the fuels programs as part of the Capehart gas station site close out. If petroleum products or their derivatives are not found in the groundwater, those areas will be designated as ECC 1. The area within the property footprint that contains the residential housing units is ECC 2 due to the groundwater being designated ECC 2.

Definitions of the 7 ECCs are as follows:

- Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
  - Category 2: Areas where only release or disposal of petroleum products has occurred.
- Category 3: Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response.
- Category 4: Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions to protect human health and the environment have been taken.
- Category 5: Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are under way, but all required remedial actions have not yet been taken.
- Category 6: Areas where release, disposal and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.
  - Category 7: Areas that are not evaluated or require additional evaluation.

#### 5. DEED RESTRICTIONS AND NOTIFICATIONS

McClellan AFB is undergoing environmental cleanup to address fuels contamination resulting from past activities. This FOST and the Group 7 SSSEBS for the property facilities and associated properties provides notification to the Transferee of the environmental condition of the property and potential risks to human health and the environment associated with environmental contamination.

The environmental documents listed in Section 1.2 were evaluated to identify environmental factors (Attachment 3) that may warrant constraints on certain activities in order to minimize substantially or eliminate any threat to human health or the environment. Such constraints typically are embodied as permanent restrictions in the deed or as specific notification to the transferee. The factors that require either deed restrictions or specific notifications are identified in Attachment 3 and are discussed below.

The Air Force has determined that the remaining factors listed in Attachment 3 pose no threat to human health or the environment and, therefore, require neither deed restrictions nor notifications to the Transferee. Please reference the EBS, SEBS, Group 7 SSSEBS and applicable VSIs for specific information on each resource category.

#### 5.1 Hazardous Substances Notification

A hazardous substance notification need not be given because no hazardous substances in quantities exceeding 1,000 kilograms or the hazardous substance's reportable quantity found at 40 CFR Part 302.4 (whichever is greater) were stored for one (1) year or more, or were known to have been released, treated, or disposed of on the property. In addition, no evidence of release of any hazardous substances to the environment was identified during the VSI conducted as part of the SSSEBS for Group 7. Attachment 4 describes one reported release to the atmosphere of chlorine gas.

#### **5.2** Installation Restoration Program (IRP) and Areas of Concern (AOCs)

IRP sites were not located on the property. Areas are located on the property, however, where storage or release of hazardous substances occurred, but at concentrations that do not require a removal or remedial response. The determination that no CERCLA remedial action is required is supported by the final Non-CERCLA Off-Base Data Gap Capehart Summary Memorandum dated December 1999 (see Attachment 5). No further action was recommended in this document. See Section 5.3.2 of this FOST for non-CERCLA site discussions.

The Deed for the sale or transfer of the property will contain a modified CERCLA §120(h)(3) covenant (for the petroleum-contaminated areas) stating that all remedial action for hazardous substances were taken and that any response action or corrective action found to be necessary after the date of such sale or transfer shall be conducted by the United States. The CERCLA §120(h)(3) covenant will state that there were no hazardous substances in quantities above their respective reportable quantities. In addition, a clause shall be included within the Deed granting the United States and appropriate State regulatory agencies to the property in any case in which a response action or

corrective action is found to be necessary after such date at such property, or such access is necessary to carry out a response action or corrective action on adjoining property.

#### **5.3 Petroleum Products and Derivatives**

Petroleum-contaminated sites are present on the property. The property within the Capehart Housing footprint has been investigated or evaluated under the Installation Restoration Program (IRP) as well as the Fuels Program and the Compliance Program of McClellan AFB. The status of each of these sites was evaluated and discussed in Section 3.6 of the Group 7 SSSEBS. The Air Force has evaluated the risks associated with these sites and has determined that this property can be used pursuant to the proposed deed, with the specified use restrictions identified below, with acceptable risk to human health or the environment and without interference with the environmental restoration process.

The following subsections summarize the status of investigation and remediation for each site. More detailed information about these sites can be found in documents 10 through 14 of Section 1.2 above.

One of the sites within the property footprint (the Capehart Gas Station) is a designated UST site under the McClellan AFB Fuels Program.

Discussions within this section focus specifically on soil, soil gas, and groundwater contamination findings for (non-CERCLA) petroleum-related sites and property within the Capehart MFH and the Lawrence Links Golf Course footprint. The following subsections summarize the location, concerns, and status of each site in the investigation process relative to the Capehart MFH and the Lawrence Links Golf Course property footprint and each non-CERCLA site.

## 5.3.1 The following non-CERCLA sites are located within or overlap the Capehart MFH and the Lawrence Links Golf Course property footprint:

Capehart Gas Station (Building 5365), Lawrence Links Golf Course, Golf Course Maintenance Complex Area, Gasoline/Diesel AST Release Area, and the Golf Cart Charging Facility (Building 5388) Area.

GROUP 7 SSSEBS Figure 3-1a shows the property footprint and the locations of these sites. GROUP 7 SSSEBS Figure 3-1b identifies the contamination status of facilities within the footprint; further information regarding facility contamination status for the Capehart MFH and the Lawrence Links Golf Course property footprint is provided in Group 7 SSSEBS Section 5.0. GROUP 7 SSSEBS Figures 3-1c and 3-1d show the contamination status of soil and soil gas, respectively, within the Capehart MFH and the Lawrence Links Golf Course property footprint. No groundwater contamination status map has been created for the Capehart MFH and the Lawrence Links Golf Course footprint; all groundwater within the footprint is designated ECC 2. GROUP 7 SSSEBS Tables 3-4 and 3-5 (in Appendix A) present the soil and soil gas contamination status, respectively, for areas within the Capehart MFH and the Lawrence Links Golf Course property footprint.

Contamination levels are described in comparison to criteria used for site categorization and are further described in the Base Realignment and Closure (BRAC) Cleanup Plan. These comparison levels are: (1) the residential PRGs for metals and organic compounds in soil, (2) the Tri-Regional Board Guideline of 100 mg/kg for only Total Petroleum Hydrocarbons (TPH) (gasoline and diesel) in soil, (3) 1,000 parts per billion-volume (ppbv) for Volatile Organic Compounds (VOCs) in soil gas (or 5,000 ppbv for Freon® or 1,000,000 ppbv for TPH), and (4) maximum contaminant levels (MCLs) for groundwater. As part of the remedial investigation for some IRP sites on base, soil samples were analyzed for VOCs. Therefore, for any VOC concentrations that were reported in soils, residential PRGs for VOCs were also used as criteria for the site's soil categorization.

#### **5.3.2 Non-CERCLA Site Descriptions:**

Capehart Gas Station (Building 5365), located at the corner of Navajo Drive and Aztec Way in the north-central portion of the cluster footprint, consists of a main store and office building (Building 5365), a four-pump gasoline island, and three 10,000-gallon gasoline USTs. Three 10,000-gallon gasoline USTs formerly located at the site were removed in 1992; the former UST location site was approved for remediation by the RWQCB in 1994. In 1987, an apparent release of approximately 2,000 gallons of unleaded gasoline was detected. The release was reportedly caused by a broken fuel pipe. The broken fuel pipe and surrounding contaminated soil was excavated in 1987. Soil and soil gas samples were collected in 1987, 1992, and 1993. Soil samples were analyzed for aromatic volatile organic compounds (AVOCs), or benzene, toluene, ethylbenzene, and xylene (BTEX) constituents, metals, total petroleum hydrocarbons (TPH), and pH. Soil gas samples were analyzed for TPH as gasoline and AVOCs. TPH as gasoline was reported at concentrations greater than Tri-Regional Board Guidelines in soils during the broken fuel piping investigation. Trace concentrations of AVOC constituents (benzene, toluene, ethylbenzene, and total xylenes) were also reported in soils. Metals concentrations were reported within normal range of background concentrations in soils. TPH as gasoline and AVOC concentrations were reported greater than 1,000,000 ppby in soil gas. No IRP groundwater samples have been collected from the Capehart Gas Station site; the three groundwater wells that provide drinking water for the parcel have been routinely sampled by the Northridge Water District as indicated in Section 5.2.5 below. A bioventing system, consisting of one vent well and eight soil-gas monitoring wells, was installed in 1994 and is currently in operation. The most recent performance data available for the system is dated March 1996 (pilot test results report date).

Golf Course Maintenance Complex Area near Building 5390, located in the central portion of the Capehart MFH and the Lawrence Links Golf Course footprint along the northern edge of the Lawrence Links Golf Course, consists of Building 5390, Building 5240, a pesticide (granular) storage conex, storage containers, and an equipment washing area. Building 5390 has only been used for maintenance activities associated with golf course, primarily the maintenance of mobile equipment (e.g., lawnmowers, tractors, etc.). Building 5240 is a PG&E gas meter facility. The equipment washing area (previously unpaved but currently covered with asphalt) is located south of a fenced area that contains Capehart Well #3 (a drinking water supply well). This drinking water supply well has been routinely sampled for contamination as indicated in Section 5.2.5 below.

Water from washing activities flows toward a stormwater drain. During a 1995 compliance audit, it was noted that tractor fluid line hoses were reportedly disconnected allowing hydraulic fluid to drain onto soil north of Building 5340. An oil sheen has also been observed on water pooled around the storm drain near the equipment washing area during previous site visits of the area. TPH as motor oil was previously reported greater than Tri-Regional Board Guidelines in soil west of Building 5240. During previous investigations and the Data Gap RI for the site, soil samples were collected from areas west and south of Building 5240, near the stormwater drain, and analyzed for VOCs, SVOCs, metals, TPH, PCBs, and pesticides. No VOC, SVOC, PCB, or pesticide concentrations were reported in soils. Metals and TPH as diesel were reported in soils less than PRGs (residential and industrial) and Tri-Regional Board Guidelines, respectively. No soil gas or groundwater samples have been collected from the site because no soil gas or groundwater contamination has been suspected for the site. In November 2000, sediment at the bottom of the stormwater drain within the maintenance complex area was sampled and analyzed for pesticides, herbicides, orthophosphates, and nitrates. Sampling results were non-detectable for pesticides and herbicides, and trace concentrations of orthophosphate and nitrate as nitrogen were reported.

Gasoline/Diesel AST Release Area, located southeast of the Maintenance Complex Area in the central portion of the Capehart MFH and the Lawrence Links Golf Course footprint, is the location of a 500-gallon diesel fuel AST with a metal containment area and a 200-gallon gasoline AST with a concrete containment area. During previous site inspections, stained soil was observed around the containment areas adjacent to the gasoline and diesel fuel ASTs. During the Data Gap RI for the site, soil samples were collected and analyzed for VOCs, SVOCs, metals, and TPH. TPH as diesel was reported greater than Tri-Regional Board Guidelines in the top 6 inches of soil near the gasoline AST. In 1999, contaminated soil was excavated to a depth of 5 feet bgs and clean soil was used for backfill. No evidence of additional fuels releases (i.e., stained soil, AST leaks, etc.) was observed in the area of the ASTs in a site investigation conducted on 13 July 2000. The Regional Water Quality Control Board accepted the Air Force's recommendation for no further action at the area. No soil gas or groundwater samples have been collected from the site as no soil gas or groundwater contamination has been suspected for the site. Metals concentrations were reported within the normal range of background concentrations, and no VOCs or SVOCs were reported.

Lawrence Links Golf Course is located in the southern half of the Capehart MFH and the Lawrence Links Golf Course footprint. Pesticides and herbicides are stored in granular form in a conex east of Bldg. 5290; they are mixed with water on the Golf Course immediately prior to application. During the non-CERCLA off-base data gap data collection effort for the site, no evidence or records (e.g., spill reports) were found to indicate that a release or spill of pesticides or herbicides had occurred on the golf course property. Therefore, no soil sampling was recommended in the final Non-CERCLA Off-Base Data Gap Summary Report/Field Sampling Plan (1999) and soil at the site is designated ECC 1. Pesticides are applied by certified applicators using EPA registered chemicals.

Golf Cart Charging Facility (Building 5388) Area, located in the southeastern portion of the Capehart MFH and the Lawrence Links Golf Course footprint, is the location of Building 5388 and

adjacent paved and unpaved area. Building 5388 is a golf cart storage and battery charging facility that has been in operation since 1982. Lead/acid batteries for golf carts are stored and handled in the facility. From 1982 to 1985, several spills of battery acid are reported to have occurred inside the facility. The floor of the facility has been historically cleaned by hosing it down with water. Wastewater from floor cleaning may have flowed to unpaved areas outside the building. During a 1995 compliance audit, dark staining was observed on the ground southeast of the facility as the result of the disposal of contents from a 55-gallon drum. The area of potential surface contamination was approximately 25 square feet. Previous soil sampling conducted in the area indicated that TPH as motor oil was present in the soil at concentrations exceeding Tri-Regional Board Guidelines. During the Data Gap RI for the site, soil samples were collected beneath the floor of Building 5388 and in unpaved areas northeast and southwest of the facility. Soil samples were analyzed for VOCs, SVOCs, metals, and TPH. Metals contamination less than residential PRGs were reported in soils. No VOC, SVOC, or TPH concentrations were reported in soils. No soil gas or groundwater samples were collected because no soil gas or groundwater contamination has been suspected as a result of this site.

#### **5.3.3** Soil Characterization:

RI findings for soils at sites within the Capehart MFH and the Lawrence Links Golf Course property footprint were evaluated to assess the contamination status of soil within the property footprint. Contaminant concentrations for soils were compared to U.S. EPA residential PRGs or the Tri-Regional Board Guidelines of 100 mg/kg TPH to identify sources of soil contamination. GROUP 7 SSSEBS Figure 3-1c identifies the environmental condition of soil for sites and property within the property footprint. Soil contamination findings are summarized as follows.

The Capehart Gas Station (Building 5365) site, located in the northern portion of the Capehart MFH and the Lawrence Links Golf Course property footprint, is a known fuels release site that is currently undergoing remediation. It has been confirmed that the former gasoline USTs and associated fuel piping were the source of TPH and AVOC contamination reported at the site in soils and soil gas. In 1987 and 1992, soil contamination was removed down to approximately 25 feet bgs during excavations of the broken fuel pipe and former USTs at the site. All soil removal actions at the site have been completed. The most recent sampling event (November 1995) indicated TPH as gasoline concentrations in soil up to 260 milligrams per kilogram (mg/kg) at 18 feet bgs. Trace concentrations (less than 1 mg/kg) of benzene, toluene, ethylbenzene, and total xylenes have been reported in soils at the site to a depth of 96 feet bgs. The ground surface of the site is entirely paved, mostly with asphalt except for concrete areas around the store/office building, underneath the canopy around the pump island, and above the UST complex. AVOC and TPH contamination in the soil and soil gas is being remediated by a bioventing system (see further discussion under "Soil Gas Characterization"). As part of the closure process for the Capehart Gas Station site, soil at the site will be sampled and analyzed for TPH as gasoline, BTEX, and MTBE to confirm site closure in accordance with applicable regulations. The Air Force is preparing a workplan (Work Plan for Confirmational Soil/Groundwater Borings for Site Closure at the Former Capehart Service Station, Building 5365) to confirm the presence or absence of TPH and its derivatives in the soil.

The Gasoline/Diesel AST Release Area site, located southeast of the Maintenance Complex Area in the central portion of the Capehart MFH and the Lawrence Links Golf Course footprint, is a known fuels release site that has undergone remediation. Soil contaminated with TPH as diesel greater than Tri-Regional Board Guidelines (maximum concentration of 750 mg/kg in top 6 inches of soil) was excavated around the containment areas for the ASTs to a depth of 5 feet bgs. The excavation was backfilled with clean soil. Currently, the area surrounding the AST containment areas is unpaved.

Within the Capehart MFH and the Lawrence Links Golf Course property footprint, data gap RI data indicate that soils at the following sites are reported as having concentrations of contaminants less than residential PRGs (such as metals, VOCs, and SVOCs) and/or less than the Tri-Regional Board Guideline for TPH (100 mg/kg): the Golf Course Maintenance Complex Area and the Golf Cart Charging Facility (5388) Area. Although TPH contamination greater than Tri-Regional Board Guidelines has been reported during previous sampling efforts at the Golf Cart Charging Facility Area, data gap RI data indicate that this contamination is no longer present in soils at the site.

#### **5.3.4** Soil Gas Characterization:

RI findings for soil gas beneath the Capehart MFH and the Lawrence Links Golf Course property footprint were evaluated to assess the contamination status of soil gas within the property footprint. VOC contaminant concentrations for soil gas were compared to the concentration level of 1,000 ppbv to identify source areas of soil gas contamination. Fuels-related VOC concentrations were compared to the concentration level of 1,000,000 ppbv. GROUP 7 SSSEBS Figure 3-1d identifies the environmental condition of soil gas for sites and property within the subject property footprint. Soil gas contamination findings are summarized as follows.

Volatile TPH and AVOC concentrations greater than 1,000,000 ppbv have been reported at the Capehart Gas Station (Building 5365) within the Capehart MFH and the Lawrence Links Golf Course property footprint. TPH as gasoline concentrations have been reported up to a maximum of 40,000,000 ppbv. Benzene concentrations have been reported up to a maximum of 3,750,000 ppbv. Toluene (maximum concentration = 3,850,000 ppbv), ethylbenzene (maximum concentration = 651,000 ppby), and total xylenes (maximum concentration = 4,360,000 ppby) have also been reported in soil gas beneath the site. No soil gas samples collected from the site have been analyzed for MTBE or other fuel oxygenates. TPH as gasoline and AVOCs have been reported in soil gas down to 97.5 feet bgs at the site (maximum concentration reported at this depth was 1,100,000 ppbv of TPH as gasoline in a sample collected in May 1994). A bioventing system, consisting of one vent well and eight soil gas monitoring wells, was installed in 1994 to remediate TPH and AVOC soil and soil gas contamination at the site. The system is still in operation. The most recent (November 1995) performance data for the system are provided in the final *Bioventing Pilot Test Results Report* for Capehart Gas Station (March 1996). The November 1995 data indicated that TPH soil gas contamination greater than 1,000,000 ppbv was still present in soil gas beneath the Capehart Gas Station site. As part of the closure process for the Capehart Gas Station site, soil gas at the site will be sampled and analyzed for volatile TPH and AVOCs to confirm site closure in accordance with

applicable regulations. The Air Force is preparing a workplan (Work Plan for Confirmational Soil/Groundwater Borings for Site Closure at the Former Capehart Service Station, Building 5365) to confirm the presence or absence of TPH and its derivatives in the soil gas.

No soil gas samples have been collected at the Lawrence Links Golf Course, Golf Course Maintenance Complex Area, Gasoline/Diesel AST Release Area, and the Golf Cart Charging Facility (Building 5388) Area because soil gas contamination has not been suspected at these sites.

#### **5.3.5** Groundwater Characterization:

No groundwater samples have been collected within the Capehart MFH and the Lawrence Links Golf Course property footprint as part of any remedial investigation under the IRP. However, groundwater at the three production wells within the footprint have been sampled by the Northridge Water District and analyzed for VOCs, metals, nitrates, radionuclides, and asbestos. The most recent well sampling event occurred in August 2000; no contaminant concentrations greater than detection limits were reported in samples collected during this event. Groundwater within the Capehart MFH and the Lawrence Links Golf Course property footprint is currently being used as a drinking water source for residences within the footprint.

A TPH as gasoline concentration greater than 1,000,000 ppbv has been reported at 97.5 feet bgs in soil gas beneath the Capehart Gas Station site. Trace concentrations of TPH as gasoline, benzene, toluene, ethylbenzene, and xylenes have been reported at 96.5 feet bgs in soils at the site. Therefore, there is a potential that groundwater beneath the site could be impacted by fuels contamination. Therefore, as part of the closure process for the Capehart Gas Station site, groundwater at the site will be sampled and analyzed for TPH as gasoline, BTEX, and MTBE to confirm the absence of these contaminants in groundwater beneath the Capehart MFH and the Lawrence Links Golf Course property footprint. Until this sampling is completed, groundwater beneath the site is designated ECC 2. The Air Force is preparing a workplan (Work Plan for Confirmational Soil/Groundwater Borings for Site Closure at the Former Capehart Service Station, Building 5365) to confirm the presence or absence of TPH and its derivatives in the groundwater. The results of the sampling and analysis will be documented in the site closeout report for the former Capehart Service Station, Building 5365.

Sampling associated with production wells does not confirm the absence of TPH because these wells are screened deep at lower groundwater zones. Ground water is estimated at between 110 and 115 feet below ground surface. The production wells are screened deeper than 115 feet (Northridge Water District, June 2001).

#### **5.3.6** Risk Overview:

The objective of this section is to provide a qualitative evaluation of the risk associated with contamination reported within or beneath the subject property footprint. Historical contaminant releases, or discharges exceeding reporting limits from facility activities, resulting in soil and soil gas contamination have been identified. TPH in soil has been reported at concentrations greater than Tri-

Regional Board Guidelines within Capehart MFH and the Lawrence Links Golf Course; however, this contaminated soil has been removed under the oversight of the Central Valley Regional Water Quality Control Board (CVRWQCB). The CVRWQCB concurred that the soil contamination was removed as documented in the Non-CERCLA Off-Base Data Gap Capehart Summary Memorandum dated December 1999. TPH and AVOC concentrations greater than 1,000,000 ppbv have been reported in soil gas within the Capehart MFH and the Lawrence Links Golf Course property footprint at the Capehart Gas Station (Building 5365) site.

Based on this evaluation, there could be a risk to human health if the pavement over areas of contaminated soils at the Capehart Gas Station is removed. The exposure route would be inhalation of AVOC vapors. Consequently, restrictions will be placed in the Deed on excavation, drilling, or any other soil disturbing activity in the area of the former Capehart Gas Station (100 feet on either side of the Gas Station). These activities as well as any other intrusive activities may be conducted only with prior written approval of the Air Force, in consultation with the BRAC Cleanup Team or other appropriate regulatory agencies.

There is a potential future risk to public health from exposure to possible fuels contamination in groundwater beneath the property footprint. While the identified exposure route would be ingestion of (potentially) contaminated groundwater, there is potable water provided by the Northridge Water District throughout the site. In addition, for the entire property footprint, deed restrictions will prohibit construction of groundwater production wells on the property and use of the groundwater. The deed will also contain additional restrictions on ground disturbance within 100 feet of the Gas Station, requiring that before any excavation, digging, or drilling in that area, approval must be obtained from the Air Force, after consultation with the regulators. These restrictions and cleanup of the site are mandated by a cleanup and abatement order of the Central Valley Regional Water Quality Control Board (in draft).

The transferee will be advised through the deed process that some or all the cleanup actions associated with the fuels cleanup of the Capehart Gas Station may impact the Transferee's quiet use and enjoyment of the deeded area. There are no known immediate or long-term health risks affecting the property from adjacent properties.

The Transferee will be advised through the Deed documents of the locations of past, present, and future cleanup actions/investigations for the property. Provisions will be placed in the Deed to allow the Air Force and regulatory agencies unrestricted access to the deeded property to conduct necessary investigation and/or cleanup activities, as well as, provisions to ensure that environmental investigations and cleanup activities will not be disrupted at any time. Such provisions include, but are not limited to, prohibiting activities that could disrupt any cleanup activities or jeopardize the effectiveness of those remedies, such as: (1) subsurface drilling unless the Air Force, after consultation with the regulators, determines that there will be no adverse impacts on the cleanup process; or (2) construction that would interfere with, negatively impact, or restrict access for cleanup work.

There are no known landfills within 1,000 feet of facilities in Capehart MFH and the Lawrence Links Golf Course property; structural monitoring requirements pursuant to CCR, Title 27, Section 66265 are not required.

#### 5.4 Underground and Aboveground Storage Tanks (USTs and ASTs)

Storage tanks are located on the property as indicated in Group 7 SSSEBS Section 3.7 and Appendix A Table 3-7 and 3-8. The Transferee will be responsible for complying with all applicable Federal, State, and local laws relating to the use of these tanks. As previously indicated in Section 5.3 above, the Transferee will be restricted from conducting any subsurface excavation, digging, drilling, or other ground disturbing activities in the area of the Capehart Service Station and Shopette without prior written approval from the Air Force. Provisions will be placed in the Deed to allow the Air Force unrestricted access to the storage tank sites to conduct investigations and/or cleanup activities. The Air Force will be responsible for remediating any contamination caused by ASTs and USTs within the Capehart MFH and the Lawrence Links Golf Course (i.e., Group 7) SSSEBS property footprint.

Four ASTs containing petroleum products (diesel fuel and gasoline) exist on the property footprint. All ASTs will be transferred to the new user in their current condition. Two of the four ASTs are already used and maintained by the Northridge Water District. The other two AST are being used by the Golf Course operator.

All formerly used USTs within the property footprint were removed between 1987 and 2001. All UST removals were under the purview of the Central Valley Regional Water Quality Control Board (CVRWQCB). The Air Force is responsible for remediating contamination caused by USTs within the property footprint in accordance with the work plan in document 14 of Section 1.2 and the work plan under development for site closeout of the Capehart Gas Station. Three 10,000-gallon USTs containing motor vehicle gasoline that were located at Facility 5365 (Capehart service station and shopette) were removed in May 2001 after the SSSEBS for Group 7 was finalized.

#### **5.5** Asbestos-Containing Material (ACM)

ACM is located on the property and is in good condition and not damaged or deteriorated to the extent that it creates a potential source of airborne fibers. Damaged asbestos indicated in the Final GROUP 7 SSSEBS for Buildings 5054, 5061, and 5253 has been repaired as indicated in the Environmental Condition report dated February 2001 (attachment 6). Notice will be provided in the deed that the Transferee will be responsible for complying with all applicable Federal, State, and local laws relating to asbestos.

#### 5.6 Lead-Based Paint (LBP) - Target Housing

The Air Force has conducted a survey using representative sampling to determine the presence of LBP in target housing on the property. Target housing is housing constructed prior to 1978, except

housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing for the elderly or persons with disabilities) or any 0-bedroom dwelling. The Transferee will be notified through the GROUP 7 SSSEBS of the presence and condition of LBP and will be provided with a copy of any LBP inspection reports. Soils around target housing were sampled for lead in 1998. As indicated in the Group 7 SSSEBS, lead concentrations ranged between 19 ppm and 190 ppm, which are below the minimum action level of 400 ppm established by the U.S. EPA.

The government is required to provide disclosure in accordance with the Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of Public Law 102-550) prior to the disposition of target housing to a non-governmental entity. Before the Transferee is obligated under any contract of sale, it will be provided with a copy of the Environmental Protection Agency lead hazard information pamphlet, *Protect Your Family from Lead in Your Home*, and given at least 10 calendar days to conduct a risk assessment or inspection for the presence of LBP hazards. The contract of sale will contain the Lead Warning Statement required by Title X, and a statement signed by the purchaser that the purchaser has (a) read the statement and understands its contents, (b) has received the information pamphlet, and (c) had 10 days to conduct a risk assessment or inspection.

The Transferee will agree, through the contract for sale, to identify LBP hazards in target housing constructed between 1960 and 1978 in accordance with Title X, and to comply with all applicable Federal, State and local laws and regulations.

#### 5.7 Lead-Based Paint (LBP) - Facilities other than Housing

LBP might be present in facilities other than housing on the property since the facilities were built prior to 1978. The Transferee will be notified through the GROUP 7 SSSEBS, of the possible presence of LBP in these facilities. Notice will be provided to the Transferee that the Transferee will be responsible for managing all LBP and potential LBP in compliance with all applicable laws and regulations.

#### **5.8** Polychlorinated Biphenyls (PCBs)

Serviceable PCB-containing equipment is not present on the property. Historically, 67 PCB oil-filled transformers were located on the property. These transformers have either been removed or retrofilled. Transformers currently located on the property do not have PCB oil concentrations exceeding 5 ppm.

#### **5.9** Air Conformity/Air Permits

Air emission sources are present on the property (e.g., backup electrical power generators at the water well pumphouses). The Transferee will be responsible for obtaining any necessary air emission permits prior to operation of these sources.

#### 5.10 Stormwater

The Air Force holds one National Pollutant Discharge Elimination System (NPDES) permit for all stormwater discharges on base property. This permit includes the Capehart MFH and the Lawrence Links Golf Course property. This permit is in the process of being cancelled. The Transferee will be required to obtain a stormwater discharge permit and be responsible for complying with NPDES requirements under that permit.

#### **5.11 Sanitary Sewer Systems (Wastewater)**

Certain facilities on the property are connected to a sanitary sewer. The Transferee will be responsible for submitting any required applications for discharging wastewater to the sanitary sewer system and for meeting all applicable wastewater discharge permit standards.

#### 6. REGULATOR COORDINATION

The Department of Toxic Substances Control (DTSC); the Regional Water Quality Control Board (RWQCB), Central Valley Region; and the United States Environmental Protection Agency (EPA) were notified in March 2001 of the initiation of this FOST and were invited to participate in preparing the working draft document. Consolidated draft documents were provided in April 2001 for their formal review and comment.

All regulator comments (see Attachment 7) were addressed and/or incorporated. A pre-final FOST was provided August 2001 for final coordination. The regulators concurred that their comments were accurately addressed, except for one unresolved issue with DTSC.

#### 7. UNRESOLVED COMMENTS:

DTSC in their August 23, 2001, letter requested that the Air Force enter into a Land Use Covenant (LUC) as would be required when institutional controls are the selected remedy for residual hazardous substances. Since the release is petroleum, and not hazardous substance, the Air Force will not enter into a LUC.

#### 8. FINDING OF SUITABILITY TO TRANSFER

Based on the foregoing information and analysis, I find this property is suitable for delivery of possession and that environmental conditions do not present an unacceptable risk to human health or the

#### 8. FINDING OF SUITABILITY TO TRANSFER

Based on the foregoing information and analysis, I find this property is suitable for delivery of possession and that environmental conditions do not present an unacceptable risk to human health or the environment, subject to the Deed containing appropriate restrictions on the activities of future recipients as addressed above.

January 18,2002

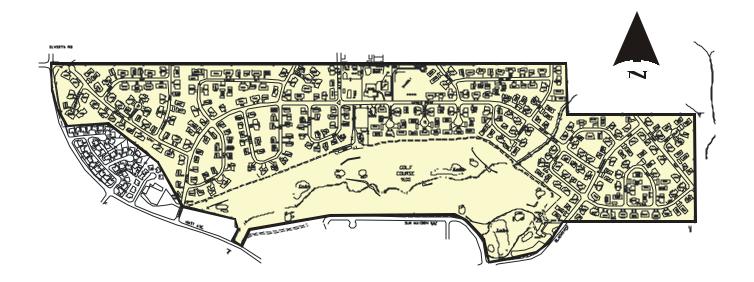
Director

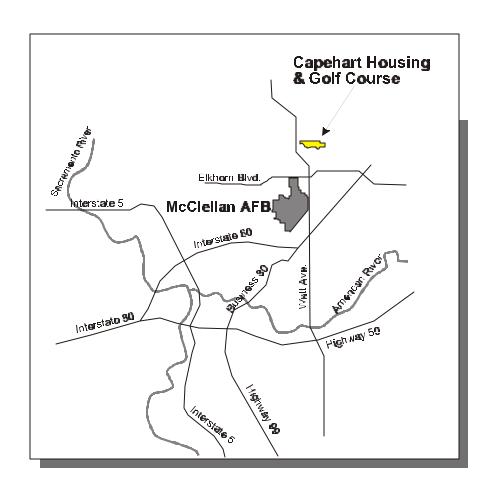
Air Force Base Conversion Agency

#### Attachments:

- 1. Fig. 1 Capehart MFH and Golf Course Property Location Map (1 page)
- 2. Fig. 2 Facility Location Map (2 pages)
- 3. Environmental Factors Considered
- 4. Notice of Hazardous Substance Release
- 5. Data Gap Summary Memorandum dated December 1999
- 6. Environmental Condition Report, dated February 2001
- 7. Regulator Letters
- 8. Response to Regulator Comments
- 9. December 2001 VSI

# FOST CAPEHART MILITARY FAMILY HOUSING AND LAWRENCE LINKS GOLF COURSE PROPERTY FOOTPRINT LOCATION





# FOST CAPEHART MILITARY FAMILY HOUSING AND LAWRENCE LINKS GOLF COURSE PROPERTY FOOTPRINT LOCATION

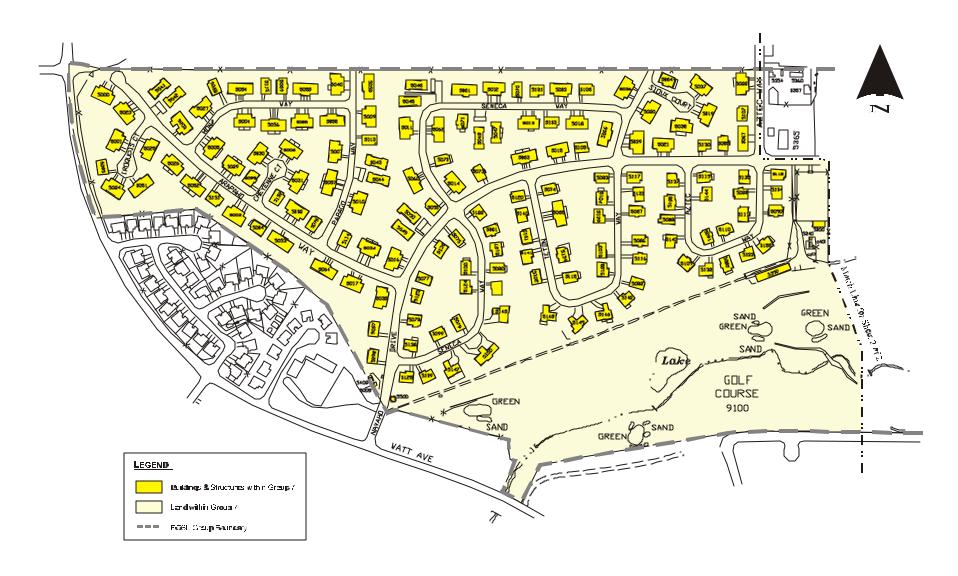


Figure 2 Sheet 1 of 2

# FOST CAPEHART MILITARY FAMILY HOUSING AND LAWRENCE LINKS GOLF COURSE PROPERTY FOOTPRINT LOCATION

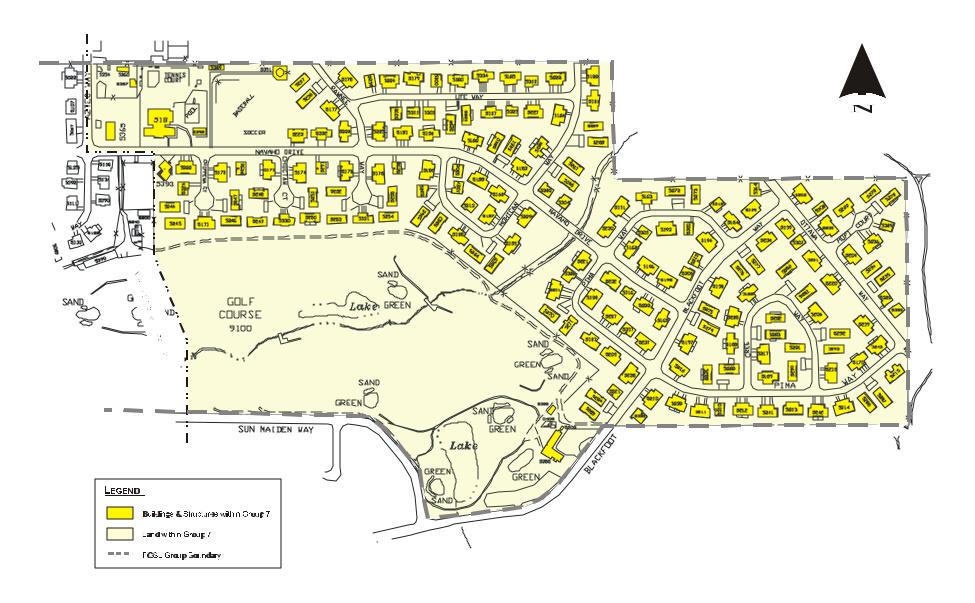


Figure 2 Sheet 2 of 2

Deed Restriction or Notification Required?		Environmental Factors Considered			
No	Yes				
		Environmental Restoration, Hazardous Substances, Petroleum:			
X		Hazardous Substances (Notification)			
X		Installation Restoration Program (IRP) and Areas of Concern			
X		Medical/Biohazardous Wastes			
X		Oil/Water Separators (OWS)			
X		Unexploded Ordnance			
X		Radioactive & Mixed Wastes			
	X	Storage Tanks (UST/ASTs) and Petroleum Product Releases			
		Disclosure Factors/Resources:			
	X	Asbestos			
X		Drinking Water Quality			
X		Indoor Air Quality			
	X	Lead-Based Paint (High-Priority Facilities)			
	X	Lead-Based Paint (Other Facilities)			
	X	PCBs			
X		Radon			
		Other Factors:			
	X	Air Conformity/Air Permits			
X		Energy (Utilities)			
X		Flood plains			
X		Historic Property (Archeological/Native American, Palentological)			
X		OSHA (Occupational Safety & Health Administration)			
X		Outdoor Air Quality			
X		Prime/Unique Farmlands:			
	X	Sanitary Sewer Systems and Industrial Waste Line (Wastewater)			
X		Biological Resources			
X		Septic Tanks (Wastewater)			
X		Solid Waste			
X		Transportation			

#### Table 2 - Notice of Hazardous Substances Released McClellan AFB Capehart Military Family Housing (MFH) and the Lawrence Links Golf Course

Notice is hereby provided that the following information from the Site Specific Supplement EBS provides notice of hazardous substances that have been released on the Capehart MFH and Lawrence Links Golf Course property of McClellan Air Force Base, and the dates the release tool. The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or "Superfund") 42 U.S.C. section 9620(h).

			Quantity	CAS		Hazaruous		
	Substance	Regulatory	Release	Registry		Waste ID		
Facility	Spilled	Synonym	(kg/lbs)	Number	Spill Date	Number	Response	Remarks
5105	Chlorine	None	4.54 kg/	7782505	19-Aug-93	NA	Not Required	Released to atmosphere. Defective
	Gas		10 lbs					regulator was replaced. Release
								reported as occuring at 3539 Navajo
								Drive. Release did not affect soil or
								ground surfaces.

Source: McClellan Air Force Base Environmental Management Spill Log Records, August 1999.

#### DATA GAP SUMMARY MEM ORANDUM December 1999

## ENVIRONMENTAL CONDITION REPORT February 2001

### SUPPLEMENTAL AGREEMENT NO. 19 TO

#### DEPARTMENT OF THE AIR FORCE LEASE NO. BCA-MCC-12-98-0801 EXHIBIT E ENVIRONMENTAL CONDITION REPORT

This Environmental Condition Report (ECR) refers to the list of buildings contained in Exhibit A of this Supplement. The undersigned Parties agree that they have read and understand the following environmental documents, which have been provided and received under a separate cover:

The Base-wide Environmental Baseline Survey (BEBS) for McClellan Air Force Base (AFB) dated November 1996,

The Base-wide SEBS dated July 1997 and the Building Survey Addendum dated December 1997, and

The SSSEBS for Group 7 Facilities and Associated Property dated January 2001.

Each Party affirmatively states that it has had the opportunity to (a) perform any inspections it deems appropriate to adequately document the condition of the Premises and the property that are subject to this Supplement to the Lease; (b) contribute to the development of the SSSEBS, BEBS, SEBS; and (c) perform inspections it deems appropriate for this transaction. The Parties further agree that, subject to the limits of the methodologies employed in preparing the SSSEBS, BEBS, SEBS, and inspections, the condition of the Premises and property that are the subject of this Supplement to the Lease are, to the best of each Parties' knowledge, as described in the SSSEBS, BEBS, and SEBS at the time of the signing of the Supplement to the Lease with the following exceptions:

- 1) The peeling lead-based paint was removed from the interior vertical surfaces at water well pump houses #1, #2, and #3 (buildings 5008, 5208, and 5200).
- 2) Damaged asbestos was repaired in housing units 5054, 5061, and 5253.
- 3) Rodent droppings were removed from housing unit 5246.
- 4) The underground storage tanks at the Capehart Gas Station (building 5365) will be removed by the Air Force. The property will be leased with the tanks in place but will not be used by the lessee.
- 5) Upon conveyance, all Air Force hazardous materials not retained by the lessee will be removed from buildings 5357, 5360, and 5393. The Air Force will remove Air Force hazardous waste from building 5357 upon conveyance.

Figures 3-1c, 3-1d, and 5-1 of the SSSEBS show the area (marked in blue on figures) around the gas station (building 5365) that is contaminated with gasoline below the ground surface. McClellan is in the process of removing this contamination through a

#### **SUPPLEMENTAL AGREEMENT NO. 19**

#### TO

## DEPARTMENT OF THE AIR FORCE LEASE NO. BCA-MCC-12-98-0801 EXHIBIT E

#### **ENVIRONMENTAL CONDITION REPORT**

bioventing system located near building 5365. The lessee will be required to obtain permission from the Air Force before performing any ground disturbing activities in this area.

DEPARTMENT OF THE AIR FORCE:

PAUL G. BRUNNER

**BRAC Environmental Coordinator** 

15 Feb-01

DATE

COUNTY OF SACRAMENTO, CALIFORNIA:

RY.

Much 12,2001

#### **REGULATORY LETTERS**

**RESPONSE TO COMMENTS** 

#### Department of Toxic Substances Control



\_\_\_\_\_

Edwin F. Lowry, Director 8800 Cal Center Drive Sacramento, California 95826-3200



Gray Davis Governor

Winston H. Hickox Agency Secretary California Environmental Protection Agency

August 23, 2001

AFBCA\DM Attn: Paul Brunner 3411 Olson Street McClellan, California 95652-1071

DEPARTMENT OF TOXIC SUBSTANCES CONTROL'S (DTSC) COMMENTS ON THE DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER, CAPEHART MILITARY FAMILY HOUSING AND LAWRENCE LINKS GOLF COURSE, McCLELLAN AIR FORCE BASE

Dear Mr. Brunner:

Enclosed are DTSC's comments on the Draft Final McClellan Air Force Base (McAFB) Finding of Suitability to Transfer (FOST), Capehart Military Family Housing and Lawrence Links Golf Course, dated August 2001 (DSR #547-3). The majority of these comments were discussed in a teleconference with Mr. Richard Solandar on August 22, 2001. Due to the presence of petroleum products in the soil under the gas station and the uncertainty regarding potential impacts to groundwater, DTSC requires a Land Use Covenant be signed prior to transfer of the property.

Should you wish to discuss the comments further or have any questions regarding this matter, please contact me at (916) 255-3717.

Sincerely,

Mark Malinowski Project Manager Office of Military Facilities Mr. Joe Healy (SFD 8-1) U.S. Environmental Protection Agency Region IX 75 Hawthorne St. San Francisco, California 94105

Mr. James Taylor California Regional Water Quality Control Board 3443 Routier Road Sacramento, California 95827

AFBCA/DM Attn: Richard Solandar 3411 Olson Street McClellan, California 95652-1071

# DTSC Comments on the Finding of Suitability to Transfer (FOST) for Capehart Military Family Housing and Lawrence Links Golf Course McClellan AFB

#### **General Comments**

- Due to the presence of petroleum hydrocarbons (TPH) and the TPH-derived compound benzene in soil, and the uncertainty of their presence in groundwater, DTSC requires a Land Use Covenant (LUC) between the Air Force and the State, be signed prior to property transfer.
- 2. DTSC recognizes that Table of Contents have not been provided in previous McAFB FOSTs. In order to aid our review, DTSC requests that this and future FOSTS, FOSETS, and FOSLs include a Table of Contents to ease review of the documents.

#### **Specific Comments**

- 1. Section 5, page 4. DTSC recommends that Section 5 include subsections to address each of the factors listed in Attachment 3, even those factors marked "No" in Attachment 3. For example, the "No" for Oil/Water Separators (OWSs) could mean that; 1) there are no OWSs present, 2) McAFB is unaware that any OWS's are present or, 3) OWSs are present, but for some reason don't require a deed restriction or notification. For clarity a short explanation for each factor is appropriate.
- 2. Section 5.3.1, Page 6, Pgph 1. DTSC does not agree with the ECC 1designation for the groundwater. DTSC believes that the entire parcel should be designated as ECC 7 due to uncertainties regarding potential groundwater impacts, flow directions, etc.
- 3. Section 5.3.6. Due to the presence and distribution of TPH and benzene in soil and uncertainty regarding groundwater impacts, a LUC will be required prior to property transfer. The LUC must include restrictions on access to soils at and around (a buffer zone) the Capehart Gas Station and a restriction on groundwater access and use for the parcel. The requirement for a LUC is consistent with recently enacted State schools legislation.

To: Brian Hovander@MCCLELLAN@AFBDA.DCM

From: Rick Solander@MCCLELLAN@AFBDA.DCM

Originated by: <Kistner.Glenn@epamail.epa.gov>

Cc:

Subject: fwd: EPA follow-up to comments on Draft Final FOST f

Attachment: BEYOND.RTF

Date: 8/29/01 1:22 PM

#### EPA Comments.

From: <Kistner.Glenn@epamail.epa.gov>, on 8/23/01 11:16 AM:

To:

ISMTP@ADMIN@AFBDA.HDQ[<mmalinow@dtsc.ca.gov>],ISMTP@ADMIN@AFBDA.HDQ[<TaylorJD@rb5s.swrcb.ca.gov>],Craig Marchione@MCCLELLAN@AFBDA.DCM,Paul Brunner@MCCLELLAN@AFBDA.DCM

Cc:

ISMTP@ADMIN@AFBDA.HDQ[<Dean.Steve@epamail.epa.gov>], ISMTP@ADMIN@AFBDA.HDQ[<Black.Ned@epamail.epa.gov>], ISMTP@ADMIN@AFBDA.HDQ[<Paull.Jeffrey@epamail.epa.gov>], ISMTP@ADMIN@AFBDA.HDQ[<Healy.Joseph@epamail.epa.gov>]

Forwarded to: Rick Solander@MCCLELLAN@AFBDA.DCM

cc: Terie Glaspey@MCCLELLAN@AFBDA.DCM

Comments by: Comments:

Paul Brunner@MCCLELLAN@AFBDA.DCM

Comments

fyi. Paul

----- [Original Message]

Mr. Paul Brunner, BEC AFBCA/DM 3411 Olson St. McClellan, CA 95652

Re: EPA Follow Up To Comments on Draft Final FOST for Capehart Military Family Housing and Lawrence Links Golf Course

Dear Mr. Brunner:

This message is to inform you that Bob Carr and I discussed the lead based paint issue with Rick Solander of your office via telephone today and that we have agreed that EPA's concern does not apply to the above referenced parcel. Please feel free to contact me if you have any questions.

Sincerely,

Glenn Kistner Remedial Project Manager (415) 744-2210 Fax (415) 744-1917

## California Regional Water Quality Control Board

Central Valley Region

Robert Schneider, Chair



#### Sacramento Main Office

Internet Address: http://www.swrcb.ca.gov/rwqcb5 3443 Routier Road, Suite A, Sacramento, California 95827-3003 Phone (916) 255-3000 • FAX (916) 255-3015

21 August 2001

Secretary for

Environmental

Protection

Attention: Mr. Paul G. Brunner AFBCA/DM 3411 Olson Street

McClellan AFB, CA 95652-1071

DRAFT FINAL FINDING OF SUITABILITY TO TRANSFER (FOST) FOR CAPEHART MILITARY FAMILY HOUSING AND THE LAWRENCE LINKS GOLF COURSE (DSR# 547-3), FORMER McCLELLAN AIR FORCE BASE (AFB), SACRAMENTO COUNTY

Thank you for the opportunity to review the subject document (FOST), submitted 8 August 2001. The FOST documents environmentally related findings and the suitability to transfer for the proposed deed of real property and any improvements at the former McClellan AFB, to the County of Sacramento, under the terms of an Economic Development Conveyance or to other agencies under a Public Benefit Conveyance. We have reviewed the FOST and have determined that our comments on the draft have been adequately addressed.

If you have any questions, please contact me at (916) 255-3069, or e-mail me at taylorid@rb5s.swrcb.ca.gov.

JAMES D. TAYLOR

cc:

Associate Engineering Geologist

Mr. Joe Healy, United States Environmental Protection Agency, San Francisco

Mr. Kevin Depies, Department of Toxic Substances Control, Sacramento

Mr. Mark Malinowski, Department of Toxic Substances Control, Sacramento

Mr. Sigmund Csicsery, AFBCA/DM, McClellan AFB

Mr. Rick Solander, AFBCA/DM, McClellan AFB

Mr. Brian Hovander, AFBCA/DM, McClellan AFB

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California Environmental Protection Agency



Recycled Paper

### California Regional Water Quality Control Board

#### **Central Valley Region**

Robert Schneider, Chair

Sacramento Main Office Internet Address: http://www.swrcb.ca.gov/rwqcb5 3443 Routier Road, Suite A, Sacramento, California 95827-3003 Phone (916) 255-3000 • FAX (916) 255-3015

Grav Davis Governor

Attention: Mr. Phil Mook

3411 Olson Street

AFBCA/DM

Winston H. Hickox

Secretary for

Environmental

Protection

McClellan AFB, CA 95652-1071

18 May 2001

DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) FOR CAPEHART MILITARY FAMILY HOUSING AND THE LAWRENCE LINKS GOLF COURSE (DSR# 547-1), McCLELLAN AIR FORCE BASE (AFB), SACRAMENTO COUNTY

Thank you for the opportunity to review the subject document (FOST), submitted 16 April 2001. The FOST documents environmentally related findings and the suitability to transfer for the proposed deed of real property and any improvements at McClellan AFB, to the County of Sacramento, under the terms of an Economic Development Conveyance or to other agencies under a Public Benefit Conveyance. Our comments on the FOST are provided below.

#### **COMMENTS**

- 1. Section 1.1, page 1, last sentence: This sentence appears to be missing words. Please revise this sentence for clarity.
- Section 1.2, page 1: This section should include a reference to "Building 5365 Underground 2. Storage Tank Site Investigation, Final Work Plan, December 2000". The FOST should also include in Section 5.4, that this work plan has been developed to describe the tank removal, site characterization and site restoration of the underground storage tank site located at Building 5365.

If you have any questions, please contact me at (916) 255-3069, or e-mail me at taylorid@rb5s.swrcb.ca.gov.

JAMES D. TAYLOR

Associate Engineering Geologist

Mr. Joe Healy, United States Environmental Protection Agency, San Francisco cc:

Mr. Kevin Depies, Department of Toxic Substances Control, Sacramento

Mr. Mark Malinowski, Department of Toxic Substances Control, Sacramento

Mr. Rick Solander, AFBCA/DM, McClellan AFB

Mr. Brian Hovander, AFBCA/DM, McClellan AFB

JDT/jt c:\mcclellan\DrCapehartFOST.doc

California Environmental Protection Agency





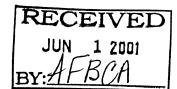
Winston H. Hickox Agency Secretary California Environmental Protection Agency May 30, 2001

### **Department of Toxic Substances Control**

Edwin F. Lowry, Director 8800 Cal Center Drive Sacramento, California 95826-3200



Gray Davis Governor



Mr. Tony Wong
Department of the Air Force
3411 Olson Drive, Room 105
McClellan Air Force Base, California 95652-1071

DRAFT FINDING OF SUITABILITY TO TRANSFER, CAPEHART MILITARY FAMILY HOUSING AND THE LAWRENCE LINKS GOLF COURSE, McCLELLAN AIR FORCE BASE

Dear Mr. Wong:

Thank you for the opportunity to review the above referenced document. The following comments are provided for your review and response:

#### **General Comments**

- 1) As previously discussed with Air Force staff, pertinent information originally contained in the draft Finding of Suitability to Lease has been omitted from this document. Please correct this discrepancy.
- 2) Please include a table of contents.
- 3) Benzene was detected in soil and soil gas at concentrations likely to have impacted groundwater. Therefore, the presence of benzene may require a risk assessment once groundwater characterization is complete.
- The document indicates that metals were compared to preliminary remediation goals (PRGs). PRGs are used only as a preliminary screen process for potential contamination. Determination of site cleanup may require a risk exposure evaluation unless detected concentrations are considerably below PRGs. Additional qualitative discussion on these comparisons are required so that the Department of Toxic Substances Control (DTSC) can determine if a risk assessment is required.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

Mr. Tony Wong May 30, 2001 Page 2

5) Please provide a section which summarizes the pesticide sampling that has been completed by the Air Force within the property boundaries being considered for transfer, including the dates conducted and results.

#### Specific Comments

- 1) Section 4, Environmental Condition of Property (ECP), Page 3. Groundwater within the property cannot be classified as ECP1 at this time since characterization hasn't been performed. Since there is a high likelihood of a total petroleum hydrocarbon (TPH) and aromatic volatile organic compounds (AVOC's) impact to groundwater, the correct ECP category at this time is ECP7. Likewise, the ECP1 category referenced on pages 5 and 10 are incorrect until such time that characterization has been conducted.
- 2) Section 5, Deed Restrictions. For clarity in reading, please transpose paragraphs 3 and 4.
- 3) Section 5.2, Installation Restoration Program and Areas of Concern, Page 4. In the second paragraph, please insert "and appropriate State regulatory agencies" after "...in the Deed to allow the United States...".
- 4) Section 5.3.5, Groundwater Characterization. Please provide a reference to the groundwater investigation work plan in this section. Additionally, a short discussion on the depth to water as compared to the screen interval of production wells should be inserted in this section.
- 5) Section 5.3.6, Risk Overview. The text states that impacted soil has been remediated. Please further clarify this statement by including a discussion on which regulatory agency has provided oversight, i.e., Regional Water Quality Control Board or Sacramento County, and whether the appropriate agency has concurred with this statement. Also, in the last paragraph of this section, please include the word "known" after "There are no...landfills within 1,000 feet...".
- Section 5.6, Lead-Based Paint. It is DTSC's understanding that sampling for lead in soil has been completed by the Air Force. However, there is no discussion addressing the sampling that has been conducted. Please provide a brief summary detailing the sampling dates, and results, that have been previously conducted.

Mr. Tony Wong May 30, 2001 Page 3

If you have any questions regarding these comments prior to responding in writing, please contact me at (916) 255-3603.

Sincerely,

Francesca D'Onofrio

Hazardous Substances Scientist

Office of Military Facilities

cc: Mr. James Taylor

Regional Water Quality Control Board

3443 Routier Road, Suite A Sacramento, California 95827

Francesca Winfrio

Mr. Joseph Healy

U.S. Environmental Protection Agency

Region IX

75 Hawthorne Street

San Francisco, California 94105

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#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

#### 75 Hawthorne Street San Francisco, CA 94105

May 25, 2001

AFBCA/DM

Attn: Tom Kempster

3411 Olson St.

McClellan, CA 95652-1071

Re:

EPA Review Comments (DSR Record #547-2) on the draft FOST for Capehart

Housing and Golf Course

Dear Tom:

Attached are comments from EPA's contractor (TLI), base closure specialist (Bob Carr), and attorney (Steve Anderson) on the draft FOST for Capehart Housing and Golf Course. I have reviewed these comments and am forwarding them to you as EPA's official comments on the above document.

If you have any questions, please do not hesitate to call me at (415) 744-2211.

Sincerely,

Joseph B. Healy, Jr.

Remedial Project Manager

#### JBH/jbh

#### Attachment:

1. TLI's comments on subject document

2. Bob Carr's and Steve Anderson's comments on subject document

cc:

James Taylor, RWQCB

Mark Malinowski, DTSC

Kevin Depies, DTSC

Rich Howard, TLI

Rick Solander, McAFB

Phil Mook, McAFB

#### **TLI's Comments**

on the

draft FOST for Capehart Housing and Golf Course

Review of "Finding of Suitability to Transfer, Capehart Military Family Housing and Lawrence Links Golf Course"

Draft

April 2001

McClellan Air Force Base

#### **GENERAL COMMENTS**

1. The "Non-CERCLA Off-Base Data Gap Capehart Summary Memorandum" (Data Gap Summary Memorandum) attached to the Finding of Suitability to Transfer (FOST) to document investigations performed on the facility is missing sections listed in its Table of Contents. Also, some materials are out of order. For example, Analytical Results of Samples EM #992010 through EM #992027 listed as 2.4 in the Table of Contents are not found in the Data Gap Summary Memorandum. The chain-of-custody forms are placed after the analytical data in 2.5 and 2.6, whereas the Table of Contents lists them as 2.2. These omissions make it difficult for the reader to verify conclusions presented in the FOST. Please include all the data listed in the Table of Contents and arrange the data to correspond to subheadings of the Table of Contents in the next version of this document.

#### **SPECIFIC COMMENTS**

- 1. Section 2, page 2, paragraph 1. The status of Buildings 5384 and 5385 appears to have changed from the Final, January 2001, Group 7 Site Specific Supplemental Environmental Baseline Survey (SSSEBS) and the Capehart FOST, but no reason for the change is provided. Buildings 5384 and 5385 were included in the list of non-housing facilities within the footprint of the Group 7 SSSEBS, but are not included with the buildings to be transferred in this FOST. Please include Buildings 5384 and 5385 in Section 2, Property Description, under the non-housing facilities in the FOST or explain why they are no longer part of the Group 7 footprint.
- 2. Section 5.3.2, page 7, Gasoline/Diesel AST Release Area and page 9, first paragraph. The lateral extent of contamination does not appear to be defined at the Gasoline/Diesel Aboveground Storage Tank (AST) Release Area site excavation, which was completed in 1999 in an area adjacent to the gasoline and diesel ASTs. The excavation was taken to a depth of 5 feet below ground surface (bgs), where the vertical extent of contamination was determined by collection of a bottom sample. The Data Gap Summary Memorandum does not include results from any sidewall samples taken at this location to determine the lateral extent of contamination. Please discuss

why sidewall samples were not taken to determine lateral extent of contamination or if sidewall samples were taken please include the results in this document.

- 3. Section 5.5, page 12. There appears to be a discrepancy in the status of Asbestos-Containing Material (ACM) for three buildings. This section states that ACM is in good condition, but Section 3.11 in the Group 7 SSSEBS had identified Buildings 5054, 5061, and 5253 as having damaged ACM, and follow-on actions had not occurred at the time the Group 7 SSSEBS was finalized in January 2001. Please explain in the text whether damaged ACM in the facilities mentioned in the Group 7 SSSEBS was repaired prior to transfer, will be repaired or whether it was not necessary to repair the ACM in the evaluated facilities.
- 4. Section 5.3.2, page 7, second complete paragraph. There appears to be a discrepancy in the location of the fuel-contaminated soil excavation. The Gasoline/Diesel AST Release Area section of the FOST states that, "TPH as diesel was reported ... near the diesel fuel AST. In 1999, contaminated soil was excavated...." Figure 2-4 of the Data Gap Summary Memorandum indicates that the excavation was performed near the gasoline AST. Please clarify the discrepancy between the Data Gap Summary Memorandum and the Draft FOST.
- 5. Section 5.3.2, page 6, Capehart Gas Station (Building 5365). It appears that different comparison levels for total petroleum hydrocarbon (TPH) and aromatic volatile organic compound (AVOC) concentrations are used in the SSSEBS and FOST. This paragraph states that, "TPH as gasoline and AVOC concentrations were reported greater than 1,000 ppbv in soil gas." The Group 7 SSSEBS, Section 3.6.2, states levels greater than 1,000,000 parts per billion by volume (ppbv) were reported in soil gas. Please change the TPH and AVOC concentrations to the 1,000,000 ppbv level stated in the Group 7 SSSEBS, or explain why a different level is used in the FOST.
- 6. Section 5.3.5, page 10, second paragraph. The fourth sentence states that groundwater samples will be sampled and analyzed but does not state where the results will be reported. The results of this groundwater sampling and analysis will be significant information for the transferee and may affect the current designation of groundwater as Category 1. Please state where the results of the Capehart Gas Station groundwater sampling and analysis will be documented.

#### MINOR COMMENTS

- 1. Section 5.4, page 11. The first sentence refers to the storage tanks indicated in the SSSEBS, but does not specify the Group 7 SSSEBS. Please change the wording of this sentence to reference the Group 7 SSSEBS.
- 2. Section 5.3.4, page 9, second paragraph. This paragraph states that ethylbenzene and total xylene maximum concentrations are "651,000" and "4,360,000" respectively, and "TPH as gasoline concentrations have been reported up to a maximum of

40,000,000". The concentrations are missing their respective units, which are presumably ppbv. Please include the missing units in the next version of this document.

#### **Bob Carr's and Steve Anderson's Comments**

on the

#### draft FOST for Capehart Housing and Golf Course

1. For the purpose of this memo we are assuming that this parcel is not part of the NPL, but that it is included within the scope of the FFA. If this is not correct, we should discuss the implications.

#### Comment text

- 2. The documents refer to the Golf Course as ECC-1 however this position is inconsistent with comments previously made regarding the potential for pesticide residue and the need for land use restrictions to avoid residential reuse w/o adequate evaluation of pesticide levels. The issue was resolved by inclusion of a restriction in the Lease, that restriction must be carried forward to the Deed. Note: without State concurrence the AF may not transfer this parcel under h4
- 3. In light of the above, the FOST should provide for a covenant under 120(h)(3) rather than (h)(4). This would also clarify the current confusion regarding which portions of the parcel are being transferred under h3 and which under h4. If portions of the transfer are to be conducted under h4, the areas considered "uncontaminated" need to be identified. If there are to be h4 transfers the language on page 4 of the current draft must be modified to exclude the phrase "that are the responsibility of the AF" and to include of the State in the access provision.
- 4. The discussion of Lead Based Paint for the residential portion of the property does not meet the requirements of DoD's Field Guide which requires the AF to meet the same requirements for housing constructed between 1960 and 1978 as TSCA 403 requires for target housing constructed prior to 1960. The current language describing disclosure does not meet the requirement to abate hazards which has been construed to mean provide an enforceable mechanism to assure that the abatement will be conducted by the transferee. See HUD 1012 Rule and Field Guide As for non residential areas the standard EPA concerns remain to be addressed.
- 5. The documents need to clearly describe the conditions surrounding the former Gas Station. Since the GW has not been evaluated, please describe plans for investigation. While the presence of petroleum does not preclude transfer under CERCLA, it would preclude the description of the GW as ECC-1 and may trigger the AF responsibility to indemnify the transferee under Section 330. The transfer documents need to describe the potential for indemnification.
- 6. There are several inconsistencies between the body of the FOST and the attachments including the Summary Memorandum. The body asserts that there is no evidence of release or disposal, but both the Attachment 4 and the Sum Memo describe releases.

	LAWRENCE LINKS GOLF COURSE								
Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response			
Response to Draft Final Comments:									
General Comment 1	N/A	N/A	N/A	DTSC Aug 23, 2001 (Mark Malinowski)	Due to the presence of petroleum hydrocarbons (TPH) and the TPH-derived compound benzene in soil, and the uncertainty of their presence in groundwater, DTSC requires a Land Use Covenant (LUC) between the Air Force and the State, be signed prior to property transfer.	The Air Force has agreed to enter into LUCs when institutional controls are selected as the remedy because of residual hazardous substances. This petroleum release site does not require institutional controls and the Air Force will not enter into a LUC.			
General Comment 2	N/A	N/A	N/A	DTSC Aug 23, 2001 (Mark Malinowski)	DTSC recognizes that Table of Contents have not been provided in previous McAFB FOSTs. In order to aid our review, DTSC requests that this and future FOSTS, FOSETS, and FOSLs include a Table of Contents to ease review of the documents.	The Air Force has considered this suggestion. To aid in your review a Table of Contents will be included with your copy of the transmittal letter; it may be inserted within your copy of the document as appropriate.			
Specific Comment 1	5	4	3	DTSC Aug 23, 2001 (Mark Malinowski)	Section 5, page 4. DTSC recommends that Section 5 include subsections to address each of the factors listed in Attachment 3, even those factors marked "No" in Attachment 3. For example, the "No" for Oil/Water Separators (OWSs) could mean that; 1) there are no OWSs present, 2) McAFB is unaware that any OWS's are present or, 3) OWSs are present, but for some reason don't require a deed restriction or notification. For clarity a short explanation for each factor is appropriate.	The Air Force only addresses those restrictions necessary for areas indicated in Attachment 3 of the FOST. Further detail on the individual sections is addressed (and can be referred to as necessary) in the SSSEBS for the Group 7 Facilities. Please note the reference to this document and other related documents in Section 5, paragraph 3 of the FOST.			
Specific Comment 2	4 5.3.1	3 6	1 & 2	DTSC Aug 23, 2001 (Mark Malinowski)	Section 5.3.1, Page 6, Pgph 1. DTSC does not agree with the ECC 1 designation for the groundwater. DTSC believes that the entire parcel should be designated as ECC 2.	The Air Force concurs. The EPA and the Air Force recognize that the surface of the Golf Course is ECC 1. Because of the potential for petroleum in the groundwater, the groundwater has been designated as ECC 2. Because of this, restrictions on use of groundwater and drilling activities apply to the entire property. This has been reflected in the FOST.			

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response			
Specific Comment 3	5.3.6	N/A	N/A	DTSC Aug 23, 2001 (Mark Malinowski)	Section 5.3.6. Due to the presence and distribution of TPH and benzene in soil and uncertainty regarding groundwater impacts, a LUC will be required prior to property transfer. The LUC must include restrictions on access to soils at and around (a buffer zone) the Capehart Gas Station and a restriction on groundwater access and use for the parcel. The requirement for a LUC is consistent with recently enacted State schools legislation	The Air Force has agreed to enter into LUCs when institutional controls are selected as the remedy because of residual hazardous substances. This petroleum release site does no require institutional controls and the Air Force will not enter into a LUC.			
1	N/A	N/A	N/A	USEPA Aug 23, 2001 (Glen Kistner)	The USEPA is satisfied that the Golf Course is an ECC-1 parcel which can be transferred under CERCLA §120 (h)(4). USEPA had no other comments.	The Air Force concurs.			
1	N/A	N/A	N/A	CRWQCB Aug 21, 2001 (James Taylor)	The California Regional Water Quality Control Board concurred that their comments on the draft FOST were adequately addressed.	The Air Force concurs.			
Response to	Draft Comm	ents:	l						
1	1.1	1	Last sentence	RWQCB May 18, 2001 (James Taylor)	Section 1.1, page 1, last sentence: This sentence appears to be missing words. Please revise this sentence for clarity.	Sentence revised to read: "Like use is assumed for facilities; that is, new uses of the facilities will remain residential, recreational, and commercial in nature."			

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response			
2	1.2 5.4	1	Item (14) Para 4	RWQCB May 18, 2001 (James Taylor)	This section should include a reference to "Building 5365 Underground Storage Tank Site Investigation, Final Work Plan, December 2000". The FOST should also include in Section 5.4, that this work plan has been developed to describe the tank removal, site characterization and site restoration of the underground storage tank site located at Building 5365.	Reference has been added as item (14) in section 1.2. The following sentence was added to section 5.4: "The Air Force is responsible for remediating contamination caused by USTs within the property footprint in accordance with the work plan in Section 1.2, document (14) and the workplan under development for site closeout of the Capehart Gas Station."			
General Comment 1	N/A	N/A	N/A	DTSC May 30, 2001 (Francesca D'Onofrio)	As previously discussed with AF staff, pertinent information originally contained in the draft Finding of Suitability to Lease has been omitted from this document. Please correct this discrepancy.	Pertinent information such as lead-based paint sampling in soils and pesticide sampling is now included in the FOST. Please see responses to comments below (General Comment 5, Specific Comment 4, Specific Comment 6). For other sections of the FOST, current version is consistent with AFBCA standard FOST format. The details of some items are incorporated by reference through the SSSEBS. The Transferee receives a copy of the SSSEBS. Also, since this FOST is for property transfer by deed rather than a lease, the section titled "Hazardous Waste Management (by Lessee)" has been deleted.			
General Comment 2	N/A	N/A	N/A	DTSC May 30, 2001 (Francesca D'Onofrio)	Please include a table of contents.	A Table of Contents is not included as it is not within the AFBCA Standard for the FOST. This FOST format is consistent with how AFBCA has prepared FOSLs, FOSTs, and FOSETs in the past.			
General Comment 3	N/A	N/A	N/A	DTSC May 30, 2001 (Francesca D'Onofrio)	Benzene was detected in soil and soil gas at concentrations likely to have impacted groundwater. Therefore, the presence of benzene may require a risk assessment once groundwater characterization is complete.	Noted. As part of the closure of the Capehart Gas Station Site, confirmation soil and groundwater sampling will be conducted. Any risk assessment will be made as appropriate.			

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Comment					T	
Number	Section	Page	Paragraph	Reviewer	Comment	Response
General Comment 4	5.3.2 5.3.3	6-9		DTSC May 30, 2001 (Francesca D'Onofrio)	The document indicates that metals were compared to preliminary remediation goals (PRGs). PRGs are used only as a preliminary screen process for potential contamination. Determination of site cleanup may require a risk exposure evaluation unless detected concentrations are considerably below PRGs. Additional qualitative discussions on these comparisons are required so that Department of Toxic Substances Control (DTSC) can determine if a risk assessment is required.	Results of sampling for metals at all locations were less than residential PRGs (at background levels or slightly above) as indicated in the SSSEBS. Text in Section 5.3.2 for the various site descriptions has been added to indicate that metals concentrations were less than residential PRGs or within normal background ranges. Section 5.3.3 (last paragraph) also describes concentrations as being less than residential PRGs. Detailed analytical results are provided in the Non-CERCLA Off-Base Data Gap Capehart Summary Memorandum dated December 1999 and the Non-CERCLA Off-Base Data Gaps Summary Reports/Field Sampling Plans dated January 1999.
General Comment 5	5.3.2	7 and 8		DTSC May 30, 2001 (Francesca D'Onofrio)	Please provide a section which summarizes the pesticide sampling that has been completed by the Air Force within the property boundaries being considered for transfer, including the dates conducted and the results.	Pesticide sampling is already discussed in section 5.3.2 in the following subsections: Golf Course Maintenance Complex Area near Building 5390, 2 <sup>nd</sup> paragraph, and Lawrence Links Golf Course.
Specific Comment 1	4	3	2	DTSC May 30, 2001 (Francesca D'Onofrio)	Section 4, Environmental Condition of Property (ECP), Page 3. Groundwater within the property cannot be classified as ECP1 at this time since characterization hasn't been performed. Since there is a high likelihood of a total petroleum hydrocarbon (TPH) and aromatic volatile organic compounds (AVOC's) impact to groundwater, the correct ECP category at this time is ECP7. Likewise, the ECP1 category referenced on pages 5 and 10 are incorrect until such time that characterization has been conducted.	As part of the closeout of the Capehart Gas Station, the Air Force is preparing a workplan to conduct groundwater confirmation sampling under the fuels program. If any TPH or its derivatives is found in the groundwater, those areas will be designated as ECC 2. This process was discussed at the BCT. Until such time, the Air Force is designating the groundwater as Category 1. The following text was added to section 4, 2nd paragraph after the 2 <sup>nd</sup> sentence: "However, confirmational groundwater sampling will be conducted under the fuels programs as part of the Capehart gas station site close out. If petroleum products or their derivatives are found in the groundwater, those areas will be designated as ECC 2."

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response			
Specific Comment 2	5	4	1, 2, and 3	DTSC (Francesca D'Onofrio)	Section 5, Deed Restrictions. For clarity in reading, please transpose paragraphs 3 and 4.	There is no paragraph 4. Section 5 was reorganized for more clarity. Paragraph 3 was omitted because it was redundant.			
Specific Comment 3	5.2	5	2	DTSC May 30, 2001 (Francesca D'Onofrio)	Section 5.2, Installation Restoration Program and Areas of Concern, Page 4. In the second paragraph, please insert "and appropriate State regulatory agencies" after "…in the Deed to allow the United States…".	Text revised as recommended.			
Specific Comment 4	5.3.5	10	2 and 3	DTSC May 30, 2001 (Francesca D'Onofrio)	Section 5.3.5, Groundwater Characterization. Please provide a reference to the groundwater investigation work plan in this section.  Additionally, a short discussion on the depth to water as compared to the screen interval of production wells should be inserted in this section.	The following text was added to the end of section 5.3.5 to reference the workplan. "The Air Force is preparing a workplan (Work Plan for Confirmational Soil/Groundwater Borings for Site Closure at the Former Capehart Service Station, Building 5365) to confirm the presence or absence of TPH and its derivatives in the groundwater." Similar language was added to sections 5.3.3 and 5.3.4.  A third paragraph was added to section 5.3.5 as follows: "Sampling associated with production wells does not confirm the absence of TPH because these wells are screened deep at lower groundwater zones. Ground water is estimated at between 110 and 115 feet below ground surface			
						between 110 and 115 feet below ground surface The production wells are screened deeper than 115 feet (Northridge Water District, June 2001)			

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response
Specific	5.3.6	11	1 and 6	DTSC	Section 5.3.6, Risk Overview. The text states	The following text was added o Section 5.3.6:
Comment				May 30, 2001	that impacted soil has been remediated.	soil has been removed "under the oversight of the
5				(Francesca	Please further clarify this statement by	Central Valley Regional Water Quality Control
3				D'Onofrio)	including a discussion on which regulatory	Board (CVRWQCB). The CVRWQCB
				,	agency has provided oversight, i.e., Regional	concurred that the soil contamination was
					Water Quality Control Board or Sacramento	removed as documented in the Non-CERCLA
					County, and whether the appropriate agency	Off-Base Data Gap Capehart Summary
					has concurred with this statement. Also, in	Memorandum dated December 1999."
					the last paragraph of this section, please	
					include the word "known" after "There are	The word "known" was inserted after "there are
					nolandfills within 1,000 feet".	no" in the first sentence of paragraph 6.
Specific	5.6	13	1	DTSC	Section 5.6, Lead-Based Paint. It is DTSC's	The following text has been added to section 5.6
Comment				May 30, 2001	understanding that lead in soil sampling has	at the end of paragraph 1: "Soils around target
6				(Francesca	been completed by the Air Force. However,	housing were sampled for lead in 1998. As
0				D'Onofrio)	there is no discussion addressing the	indicated in the Group 7 SSSEBS, lead
				2 (1101110)	sampling or subsequent sampling results that	concentrations ranged between 19 ppm and 190
					have been conducted. Please provide a brief	ppm, which are below the minimum action level
					summary detailing the sampling dates, and	of 400 ppm established by the U.S. EPA."
					results, that have been previously conducted.	-

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response
General Comments	N/A	N/A	N/A	U.S. EPA (TLI) May 25, 2001	The "Non-CERCLA Off-Base Data Gap Capehart Summary Memorandum" (Data Gap Summary Memorandum) attached to the Finding of Suitability to Transfer (FOST) to document investigations performed on the facility is missing sections listed in its Table of Contents. Also, some materials are out of order. For example, Analytical Results of Samples EM #992010 through EM #992027 listed as 2.4 in the Table of Contents are not found in the Data Gap Summary Memorandum. The chain-of-custody forms are placed after the analytical data in 2.5 and 2.6, whereas the Table of Contents lists them as 2.2. These omissions make it difficult for the reader to verify conclusions presented in the FOST. Please include all the data listed in the Table of Contents and arrange the data to correspond to subheadings of the Table of Contents in the next version of this document.	Missing pages and sections in the "Non CERCLA Off-Base Data Gap Capehart Summary Memorandum" have been replaced, and the document has been organized properly. A corrected copy is provided with the FOST.
Specific Comment 1	2	2	1 and 2	U.S. EPA (TLI) May 25, 2001	Section 2, page 2, paragraph 1. The status of Buildings 5384 and 5385 appears to have changed from the Final, January 2001, Group 7 Site Specific Supplemental Environmental Baseline Survey (SSSEBS) and the Capehart FOST, but no reason for the change is provided. Buildings 5384 and 5385 were included in the list of non-housing facilities within the footprint of the Group 7 SSSEBS, but are not included with the buildings to be transferred in this FOST. Please include Buildings 5384 and 5385 in Section 2, Property Description, under the non-housing facilities in the FOST or explain why they are no longer part of the Group 7 footprint.	Facilities 5384 and 5385 were added to the non-housing facilities list. Facility 5385 was demolished in 1992. Also, bus shelters (5395, 5397, 5398, 5399) and the pool (5396) were added. These were not included in the SSSEBS because they are not considered buildings. Carports (5340 and 5350) and a gazebo (5387) are also included as structures in the FOST.

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response
Specific Comment 2	5.3.2	7	Gasoline/ Diesel AST Release Aera	U.S. EPA (TLI) May 25, 2001	Section 5.3.2, page 7, Gasoline/Diesel AST Release Area and page 9, first paragraph. The lateral extent of contamination does not appear to be defined at the Gasoline/Diesel Aboveground Storage Tank (AST) Release Area site excavation, which was completed in 1999 in an area adjacent to the gasoline and diesel ASTs. The excavation was taken to a depth of 5 feet below ground surface (bgs), where the vertical extent of contamination was determined by collection of a bottom sample. The Data Gap Summary Memorandum does not include results from any sidewall samples taken at this location to determine the lateral extent of contamination. Please discuss why sidewall samples were not taken to determine lateral extent of contamination or if sidewall samples were taken please include the results in this document.	Sidewall samples were not taken because it was felt that the contamination was localized and that the excavation was large enough to capture all residual horizontal migration of TPH. The Regional Water Quality Control Board did not require the Air Force to take sidewall samples and approved the site for No Further Action.  The following sentence was added to the section: "The Regional Water Quality Control Board accepted the Air Force's recommendation for no further action at the area."
Specific Comment 3	5.5	13	1	U.S. EPA (TLI) May 25, 2001	Section 5.5, page 12. There appears to be a discrepancy in the status of Asbestos-Containing Material (ACM) for three buildings. This section states that ACM is in good condition, but Section 3.11 in the Group 7 SSSEBS had identified Buildings 5054, 5061, and 5253 as having damaged ACM, and follow-on actions had not occurred at the time the Group 7 SSSEBS was finalized in January 2001. Please explain in the text whether damaged ACM in the facilities mentioned in the Group 7 SSSEBS was repaired prior to transfer, will be repaired or whether it was not necessary to repair the ACM in the evaluated facilities.	The damaged ACM associated with housing units 5054, 5062, and 5253 was repaired. Documentation that this occurred was in the Environmental Condition Report (ECR) dated February 2001. This ECR is provided as attachment 6 to the FOST.  The following sentence was added to section 5.5: "Damaged asbestos indicated in the Final Group 7 SSSEBS for Buildings 5054, 5061, and 5253 has been repaired as indicated in the Environmental Condition report dated February 2001 (attachment x)."

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response			
Specific Comment 4	5.3.2	7	Gasoline/ Diesel AST Release Area	U.S. EPA (TLI) May 25, 2001	Section 5.3.2, page 7, second complete paragraph. There appears to be a discrepancy in the location of the fuel-contaminated soil excavation. The Gasoline/Diesel AST Release Area section of the FOST states that, "TPH as diesel was reported near the diesel fuel AST. In 1999, contaminated soil was excavated" Figure 2-4 of the Data Gap Summary Memorandum indicates that the excavation was performed near the gasoline AST. Please clarify the discrepancy between the Data Gap Summary Memorandum and the Draft FOST.	Figure 2-4 of the Data Gap Summary Memorandum is correct. Diesel fuel was reported near the gasoline AST. Figure 2-2 of the Data Gap Summary Memorandum is incorrect and will be corrected (this is the Figure that caused the error in the FOST and the SSSEBS). Text in question in Section 5.3.2 of the FOST was changed to read: "TPH as diesel was reported greater than Tri-regional Board Guidelines in the top 6 inches of soil near the gasoline AST."			
Specific Comment 5	5.3.2	6	Capehart Gas Station (Building 5365)	U.S. EPA (TLI) May 25, 2001	Section 5.3.2, page 6, Capehart Gas Station (Building 5365). It appears that different comparison levels for total petroleum hydrocarbon (TPH) and aromatic volatile organic compound (AVOC) concentrations are used in the SSSEBS and FOST. This paragraph states that, "TPH as gasoline and AVOC concentrations were reported greater than 1,000 ppbv in soil gas." The Group 7 SSSEBS, Section 3.6.2, states levels greater than 1,000,000 parts per billion by volume (ppbv) were reported in soil gas. Please change the TPH and AVOC concentrations to the 1,000,000 ppbv level stated in the Group 7 SSSEBS, or explain why a different level is used in the FOST.	Text in question was changes to read: "TPH as gasoline and AVOC concentrations were reported greater than 1,000,000 ppbv in soil gas			

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response
Specific Comment 6	5.3.5	10	2	U.S. EPA (TLI) May 25, 2001	Section 5.3.5, page 10, second paragraph. The fourth sentence states that groundwater samples will be sampled and analyzed but does not state where the results will be reported. The results of this groundwater sampling and analysis will be significant information for the transferee and may affect the current designation of groundwater as Category 1. Please state where the results of the Capehart Gas Station groundwater sampling and analysis will be documented.	"The results of the sampling and analysis will be documented in the site closeout report for the former Capehart Service Station, Building 5365." This statement has been added to the end of the second paragraph in Section 5.3.5. As indicated in response to DTSC Specific Comment 4, a workplan is being prepared for the confirmational sampling (Work Plan for Confirmational Soil/Groundwater Borings for Site Closure at the Former Capehart Service Station, Building 5365).
Minor Comment 1	5.4	12	1	U.S. EPA (TLI) May 25, 2001	Section 5.4, page 11. The first sentence refers to the storage tanks indicated in the SSSEBS, but does not specify the Group 7 SSSEBS. Please change the wording of this sentence to reference the Group 7 SSSEBS.	Text changed to read: "Storage tanks are located on the property as indicated in Group 7 SSSEBS Section 3.7 and Appendix A Table 3-7 and 3-8."
Minor Comment 2	5.3.4	9	2	U.S. EPA (TLI) May 25, 2001	Section 5.3.4, page 9, second paragraph. This paragraph states that ethylbenzene and total xylene maximum concentrations are "651,000" and "4,360,000" respectively, and "TPH as gasoline concentrations have been reported up to a maximum of 40,000,000." The concentrations are missing their respective units, which are presumably ppbv. Please include the missing units in the next version of this document.	Units were added to concentration values.
1	N/A	N/A	N/A	U.S. EPA May 25, 2001 (Bob Carr & Steve Anderson)	For the purpose of this memo we are assuming that this parcel is not part of the NPL, but that it is included within the scope of the FFA. If this is not correct, we should discuss the implications.	The Capehart Military Family Housing and Golf Course are not part of the NPL and have not been considered as within the scope of the FFA by the BRAC Cleanup Team. The site has been treated as a non-CERCLA site. This was discussed with Mr. Bob Carr, U.S.EPA Region 9, the week of July 23, 2001.

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response				
2				U.S. EPA May 25, 2001 (Bob Carr & Steve Anderson)	The documents refer to the Golf Course as ECC-1 however this position is inconsistent with comments previously made regarding the potential for pesticide residue and the need for land use restrictions to avoid residential reuse w/o adequate evaluation of pesticide levels. The issue was resolved by inclusion of a restriction in the Lease, that restriction must be carried forward to the Deed. Note: without State concurrence the AF may not transfer this parcel under h4.	The decision that the Golf Course is ECC-1 is consistent with Air Force interpretation of OSWER Directive 9345.0-09 (Corrected Version), April 19,1994. Absent evidence indicating a threat to human health or the environment, or of extensive application of pesticides, a CERCLA 120(h)(4) covenant is appropriate. The Air Force believes, from testing at Mather AFB, that unless there is some reason to believe it is not the case, that Air Force golf courses in this region will not have concentrations of pesticides above residential PRGs in areas other than mixing areas. As indicated in the SSSEBS and FOST for Group 7, sampling at pesticide storage and mixing areas showed no pesticide contamination.				

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response
3	5.2	5	2	U.S. EPA May 25, 2001 (Bob Carr & Steve Anderson)	In light of the above, the FOST should provide for a covenant under 120(h)(3) rather than (h)(4). This would also clarify the current confusion regarding which portions of the parcel are being transferred under h3 and which under h4. If portions of the transfer are to be conducted under h4, the areas considered "uncontaminated" need to be identified. If there are to be h4 transfers the language on page 4 of the current draft must be modified to exclude the phrase "that are the responsibility of the AF" and to include of the State in the access provision.	The following text was inserted as parageaph 2 of Section 5.2: "The Deed for the sale or transfer of the property will contain a modified CERCLA \$120(h)(3) covenant (for the petroleum contaminated areas) and a CERCLA \$120(h)(4) covenant (for the uncontaminated areas) warranting that any response action or corrective action found to be necessary after the date of such sale or transfer shall be conducted by the United States. All areas of the property will be transferred under the CERCLA \$120(h)(4) covenant except those areas designated as ECC 2 on Figure 5-1 of the Group 7 SSSEBS. The ECC 2 areas will be transferred under the modified CERCLA 120(h)(3) covenant. The CERCLA 120(h)(3) covenant will clarify that there were no hazardous substances in quantities above their respective reportable quantities. In addition, a clause shall be included within the Deed granting the United States and appropriate State regulatory agencies access to the property in any case in which a response action or corrective action is found to be necessary after such date at such property, or such access is necessary to carry out a response action or corrective action on adjoining property."

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Comment Number	Section	Page	Paragraph	Reviewer	Comment	Response
4	5.6	13	1	U.S. EPA May 25, 2001 (Bob Carr & Steve Anderson)	The discussion of Lead Based Paint for the residential portion of the property does not meet the requirements of DoD's Field Guide which requires the AF to meet the same requirements for housing constructed between 1960 and 1978 as TSCA 403 requires for target housing constructed prior to 1960. The current language describing disclosure does not meet the requirement to abate hazards that have been construed to mean provide an enforceable mechanism to assure that the abatement will be conducted by the transferee. See HUD 1012 Rule and Field Guide As for non-residential areas the standard EPA concerns remain to be addressed.	The disclosure and notification requirements for lead-based paint are in accordance with the most recent AFBCA policy on management of lead-based paint: "Operating Procedures for the Management of Lead-Based Paint at Air Force Base Realignment and Closure Installations" dated May 2001. These new procedures incorporate the DoD/EPA Field Guide, HUD regulations, and EPA's TSCA 403 standards.  Soil sampling was conducted for lead-based paint at target housing. Sample results were less than 400 ppm. As indicated in DTSC Specific Comment 6, the following text has been added to section 5.6 at the end of paragraph 1: "Soils around target housing were sampled for lead in 1998. As indicated in the Group 7 SSSEBS, lead concentrations ranged between 19 ppm and 190 ppm, which are below the minimum action level of 400 ppm established by the U.S. EPA."
5	4 and 5.3.5			U.S. EPA May 25, 2001 (Bob Carr & Steve Anderson)	The documents need to clearly describe the conditions surrounding the former Gas Station. Since the GW has not been evaluated, please describe plans for investigation. While the presence of petroleum does not preclude transfer under CERCLA, it would preclude the description of the GW as ECC-1 and may trigger the AF responsibility to indemnify the transferee under Section 330. The transfer documents need to describe the potential for indemnification.	Clarifying text was added to Sections 4 and 5.3.5. Please see response to DTSC Specific Comments 1 and 4.

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Comment						
Number	Section	Page	Paragraph	Reviewer	Comment	Response
6	N/A	N/A	N/A	U.S. EPA	There are several inconsistencies between the	As discussed with Mr. Bob Carr the week of July
				May 25, 2001	body of the FOST and the attachments	23, 2001, the FOST and attachments are
				(Bob Carr &	including the Summary Memorandum. The	consistent.
				Steve	body asserts that there is no evidence of	
				Anderson)	release or disposal, but both the Attachment 4	The Summary Memorandum (and FOST) reports
					and the Sum Memo describe releases.	that potential releases and disposals were
						investigated (around the battery acid charging
						facility, for example). Samp ling results indicated
						levels of contaminants less than residential PRGs
						as indicated in the FOST. These levels do not
						trigger a Hazardous Substance Notification under
						CERCLA (no evidence of any reportable quantity exceeded), hence the statement in
						section 5.1 that there is no evidence of hazardous
						substance release or disposal. Petroleum
						products were released as described in the FOST,
						but these do not require a hazardous substance
						notification under CERCLA.
						nonneation under CERCERI.
						The chlorine gas leak was described in section
						5.1 and in attachment 4.

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#### **Attachment 9**

**DECEMBER 2001 VSI** 

Facility Number/Surrounding Property: Capehart Housing and Lawrence Links Golf Course. See SSSEBS for building numbers. Facility Name: Capehart Housing and Lawrence Links Golf Course 60 °F 16 Nov 2001 Date Surveyed: Weather Conditions: Overcast Temp: Precip: None & 4 Dec 2001 Rick Solander Wind: Surveyor: None Facility Escort (as required): Linda Brophy Visibility: Good Facility Escort Phone (916) 643-6420 x 108 Number(s): Last VSI Conducted: Year Built: 1960 (see SSSEBS) February 2001 Current Uses (include any special operations/equipment used): Housing, Golf Course, Recreation Center Past Use(s): Unknown Same as above Χ Other (specify): Source of Past Use(s) Info: SSSEBS for Capehart Housing and Lawrence Links Golf Course Bio/Physical Setting (such as topography, surface drainage, and runoff, etc.): Same as noted in VSIs included in SSSEBS Describe "Housekeeping" appearance in and around building: Good for entire property

Condition of Exterior Painted Surfaces: Exterior surfaces are in good condition. McClellan Park has removed flaking paint and repainted exterior surfaces of housing units.

Condition of Interior Painted Surfaces: Good condition. McClellan Park has renovated housing units to

ready them for lease.

Additional Site/Structure/Building Specific None Interview(s) (Name & Phone Number) (If Applicable):

#### HAZARDOUS MATERIAL / WASTE

Are Hazardous Materials Present? Yes X No Hazardous Wastes? Yes No X

Are any of the Hazardous Materials/Wastes Radioactive?	Yes		No	X		
Describe Type: Not Applicable						
Are any Petroleum Products Present?	Yes	Χ	No			
Type of Hazardous Materials Present:	Petroleum products (diesel fuel, gasoline, motor oil, hydraulic fluid, other lubricants), household cleaners, water based-paint, herbicides, lead-acid batteries (for golf carts), chlorine (for swimming pool). All Air Force hazardous materials have been removed from the property. Hazardous materials present on the property are managed and owned by the lessees.					
Type of Hazardous Materials Storage (e.g. drums, boxes, tanks, small Drums and small containers					Drums and small containers. Aboveground storage tanks.	
IAP or ACCS Present?	Yes		No	X		
TAP or ACCS Present? Yes No X						
Location(s) of Not Appli	cable					
IAP/ACCS:						
Type of Hazardous Waste Present: Not Applicable						
Type of Hazardous Waste Storage (e.g. drums, boxes, tanks, bowsers, roll-off bins):  Not Applicable						
IAP Disposal Practices (ACCS destination): Not Applicable						
Changed Hazardous Materials/Waste Conditions since last VSI: All Air Force hazardous materials and waste						

have been removed from the property.

#### **Potential Issues Checklist:**

Cite indications of the following with a check by the appropriate item. Elaborate in the remarks section (on back of page) if additional clarification is required or if potential issue causes a concern.

$\boxtimes$	UST/AST (ASTs - See SSSEBS)		Evidence of Improper Disposal			
	Radiation		Energy Source (describe if non-standard utilities)			
	Oil/Water Separator		Noxious Odors (describe)			
	Grease Traps		Stressed Vegetation (potential chemical release)			
	Septic Tank		Sensitive Receptors			
$\boxtimes$	Sumps		Discolored Soil (outdoor spills)			
$\boxtimes$	Stormwater Drain		Fill Areas/Partially Buried Objects			
	IWL Drains/Effluent Waste Discharge (describe use and type)		Surface Water			
$\boxtimes$	Sanitary Sewer Drain		Fraying Insulation			
	Waste Piles (describe)		Operation/Equipment of Concern (see check list below)			
	Suspected Lead Paint (age <1978, and/or positive result)	$\boxtimes$	ODCs (chillers, fire suppressors, etc.)			
$\boxtimes$	Suspected ACM (positive result)		Landfills within 1000 ft (GIS/data)			
	Suspected PCB's (leaking transformers)		Medical/Biological Wastes (describe)			
$\boxtimes$	Suspected PCB's (fluorescent light ballasts)	$\boxtimes$	Permits (air, waste treatment, radiation)			
	Suspected PCB's (tagged equipment)		Drum/Container Storage			
	Stained Industrial Sinks		Other (explain below)			
	Evidence of Spills (indoor spills)					
	Evidence of Spills (outdoor spills)					
Other issues, conditions, or discrepancies that potentially present a concern:  None						
Operation/Equipment of Concern (check all that apply):						
	Plating Shop		Washrack			
	Machine Shop		Degreaser			
	Ballbearing Repair Shop		Engine Testing/Repair Shop			
	Electronics Repair Shop		Physical Science/Testing Lab			
	Instrument Calibration/Repair Area	$\boxtimes$	Battery Shop (lead/acid battery charging)			
	Paint/Solvent Spray Booth		Motor/Generator Repair Shop			
	Fuel Bladder Shop		Hydraulic Equipment Repair/Testing Shop			
	Treatment Plants		Media Blast			
$\boxtimes$	IRP Systems (i.e. SVE units etc.)		Other (explain below)			
Other Operations/Equipment: None						

#### **REMARKS**:

<u>USTs/ASTs</u> - The UStTs at the Capehart Gas Station were removed since the last VSI. No USTs exist on the property.

<u>Suspected Lead-Based Paint</u> - McClellan Park has removed flaking paint from the exterior of facilities and housing units and has repainted surfaces.

<u>Permits</u> - Air permits are associated with the diesel generators that are used as a backup energy supply for the potable water wells. These wells and associated generators and permits are owned by Northridge Water District.

IRP Systems - Consists of a bioventing unit at the former Capehart Gas Station.

Additional Structure - A wooden shed (10 feet by 10 feet with no foundation) located twelve feet west of building 5360 is not listed on Air Force real property records and there is no building number on the shed. Facility maps, however, show this structure as building 5354. Based on a Visual Site Inspection conducted on 4 December 2001, there are no environmental concerns associated with this structure.